



PLAYING THE HOUSING GAME

**Learning to Use HUD's
Consolidated Plan to Expand
Housing Opportunities for
People with Disabilities**



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INTRODUCTION

Did you know that there is money available to increase the amount of affordable housing in your community? And did you know that the disability community has both the right and the opportunity to be involved in deciding how this money is used? People with disabilities, their families, and advocates *can* get involved and influence these decisions through a process called the Consolidated Plan (ConPlan). This guidebook provides answers to key questions about this federally mandated housing plan, including: What is the ConPlan? How does it influence housing policies and federally funded housing activities in communities? And, most importantly, how can the disability community use the ConPlan process to expand housing opportunities for people with disabilities?



The ConPlan is a long-term housing plan that controls access to US Department of Housing and Urban Development (HUD) resources used to expand affordable housing opportunities. The ConPlan is intended to be a five-year comprehensive housing strategy that includes several pieces of key information. The ConPlan contains a housing needs *assessment*, which documents the need for affordable housing within in a state or community, and both a five-year comprehensive plan and a one-year action plan, which describe the activities that will be undertaken each year to address these needs.

HUD requires all states and localities that have already developed a ConPlan, to create a new plan during the year 2000 that covers the next five-year period. In order to ensure people with disabilities receive their "fair share" of federal housing resources, it is crucial the disability community be actively involved in the creation of their community or state ConPlan. Fortunately, the process used to develop these plans requires everyone to have the opportunity to participate *and* provide input, including people with disabilities and disability advocates. The information and approaches detailed in this guidebook will help the disability community participate in the ConPlan process, with the goal of expanding federally funded housing approaches for people with disabilities.

DEFINITIONS

While reading this guidebook you will note some technical terms will be used with which you may not be familiar. In order to facilitate the reader's understanding, these terms are defined below.

ConPlan Resources or ConPlan Funds

These terms are used interchangeably to refer to the HUD programs (i.e., Community Development Block Grant, Emergency Shelter Grant, HOME, and Housing Opportunities for People with AIDS), and the funds supporting these programs, that *are* directly controlled by the Consolidated Plan.



Localities

This term *refers* to a geographic area, such as a city, urban county, town, or community, and is used to differentiate this area from the state as a whole. Each HUD program controlled by the Consolidated Plan utilizes its own terminology to define the geographic area where the funds may be spent. For example, the HOME program uses the term "participating jurisdictions" to refer to cities with populations greater than 50,000 and urban counties with populations greater than 250,000 that receive federal HOME funding directly from HUD. The Community Development Block Grant (CDBG) program, uses "entitlement communities" to mean those communities or counties that, due to size and other HUD criteria, are eligible to receive CDBG funding directly from HUD.

For matters of convenience, this guidebook will use the *general* terms "state" or "locality" to define all those federally defined geographic areas that *are* required to submit a ConPlan in order to obtain any federal housing resources.

CITATIONS

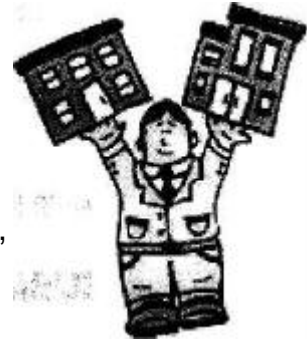


Whenever possible, the laws or HUD documents that govern the ConPlan or related documents have been *referenced* in the main text, endnotes, or citations section of this guidebook. Many of the HUD regulations *are* found at Part 24 of the US Code of Federal Regulations (CFR) and are cited in the text as "24 CFR."

To obtain free copies of the Code of Federal Regulations including the HUD regulations, visit the HUD web site (<http://www.hud.gov>) or call HUD's Community Connections at (800) 998-9999 or your local HUD field office. You may also find copies of the regulations in the Federal Register at your local library.

CHAPTER 1: WHAT IS THE CONSOLIDATED PUN?

The ConPlan could be considered the "master plan" for affordable housing in local communities and states. It is a community-based strategic planning document mandated by federal law and administered through the US Department of Housing and Urban Development (HUD). It is the community's application to HUD for specific housing funds and is intended by law to be a **long-range planning document** that describes housing needs, market conditions, and housing strategies, including *an* action plan for the investment of federal housing funds.¹



The ConPlan is prepared by all states and certain local government jurisdictions—and approved by HUD—before these states and local governments *can receive* specific federal housing and community development funds from the HOME, Community Development Block Grant, Housing Opportunities for People with AIDS, and Emergency Shelter Grant programs.

In order to ensure that people with disabilities get their "fair share" of these federal housing resources, it is critically important that the disability community understands how the ConPlan process works in their community or state, and finds the most effective way to become involved. New federal housing resources targeted toward people with disabilities have declined significantly since 1995, including the Section 811 Supportive Housing Program for Persons with Disabilities. Thus it is important to pursue **all** federal housing programs, including those controlled by the ConPlan, to expand and enhance housing opportunities for people with disabilities.

Built into the ConPlan process *are* requirements for a substantial level of community input and public participation (these requirements *are* discussed further in Chapter 2). The law requires that a new ConPlan be prepared at least once every five years (although states and localities *are* permitted to revise their five-year ConPlan at anytime if housing needs, market conditions, or priorities change). Right now is the ideal time to get involved because most states and many communities *across* the nation will be **required** to develop a new ConPlan during the year 2000.

WHY SHOULD I CARE ABOUT THE CONPLAN?

The ConPlan is important to the disability community for three main reasons: 1) it controls how federal housing funds will be used to expand affordable housing; 2) it determines who will benefit from these affordable housing activities; and 3) the federal government is making it a key document by linking other HUD housing programs and strategies to it.

The ConPlan is your **best chance** to go on record about the housing crisis facing people with disabilities in your community or state. Most of the resources controlled by the ConPlan *are* specifically targeted to low-income households, including people with disabilities. People with disabilities *are* among the lowest income households in the country. The national average income of an individual with a disability receiving Supplemental Security Income (SSI) benefits is only 24 percent of the typical one-person income in the country.² People receiving SSI *are* too

poor to obtain decent and affordable housing unless they have the type of housing assistance controlled by the *ConPlan* and other federal housing programs.

Recent legislation and HUD policies have linked other HUD programs to the ConPlan, thus emphasizing its role as the "master" plan. Specifically, HUD has mandated that the ConPlan be linked to two other planning documents—the McKinney Continuum of Care and the new Public Housing Agency Plan. Due to the linkage between these housing plans it is extremely critical that the disability community understand all three plans, the relationships among them, and how they can get involved in their preparation. Chapter 3 provides more details on the other HUD housing plans.

WHO MUST SUBMIT A CONPLAN?

A unit of local government³ that receives any of the following program funding **directly**⁴ from HUD must submit a ConPlan:

- Community Development Block Grant Program (CDBG);
- HOME Investment Partnerships Program (HOME);
- Emergency Shelter Grant (ESS); and/or
- Housing Opportunity for Persons with AIDS (HOPWA).



Every state must also submit a ConPlan. The state ConPlan covers all communities within the state that do not qualify to receive these funds directly from HUD.

At the local level, the planning or community development department is usually responsible for coordinating the preparation of the ConPlan. At the state level, the state's housing agency (it may be called the Department of Community Affairs or Community Development, the state Housing Finance Agency, or the Department of Economic Development) develops the ConPlan.⁵

Not every state or locality that submits a ConPlan receives funding for all four programs listed above. In most cases, however, if a state or locality receives both CDBG and HOME program funds, the same department in the city or state government typically administers them.

WHAT KIND OF RESOURCES ARE CONTROLLED BY THE CONPLAN AND HOW CAN THEY BE USED?

As stated above, the four HUD programs controlled by the ConPlan include the:

- | | |
|------------------|------------------------|
| 1. HOME Program; | 3. ESG; and |
| 2. CDBG; | 4. HOPWA. ⁶ |

The amount of money that a state or locality *receives* for each program is determined by a formula based on the amount of funding appropriated by Congress each year. Appendix 1 provides the fiscal year 1999 allocations for each of these four HUD programs.



Decisions about how these four federal housing programs will be used are made during the ConPlan process. At the state and local level, a portion of CDBG funding, and all of the HOME and HOPWA funding, must be spent on affordable housing -related activities, including:

- housing rehabilitation;
- grants and loans for affordable housing development;
- down payments and other assistance to increase homeownership opportunities;
- tenant-based rental assistance (HOME and HOPWA); and
- emergency shelter or services programs for people who are homeless (ESG only).

All of these housing activities can benefit people with disabilities. For example, a portion of HOME program funding *can* be targeted for a rental assistance program for homeless people with disabilities or for homeownership activities that would benefit people with disabilities. People with disabilities can also benefit from CDBG grants and loans used to develop affordable housing by ensuring that some of the units *are* affordable and accessible to people receiving SSI benefits.

1. HOME Program

The federal government created the HOME Investment Partnerships Program in 1990⁷. The HOME program is a formula grant of federal housing funds given to states and localities. During 1999, Congress appropriated \$1.6 billion that was distributed by formula to approximately 500 communities and states.

HOME funds *can* be used for the following housing activities:

- rental housing production and rehabilitation loans and grants;
- first-time homebuyer assistance;
- rehabilitation loans for homeowners; and
- tenant-based rental assistance (2 year renewable subsidies).

All housing developed with HOME funds must serve low- and very low-income individuals and families. For rental housing, at least 90 percent of HOME funds must benefit families whose incomes *are* at or below 60 percent of *area* median income; the remaining 10 percent must benefit families with incomes at or below 80 percent of *area* median income. (Your state or participating jurisdiction may have even lower income targeting for their HOME funds). 15 percent of a state or locality's HOME funds must be set-aside for use by community based non-profit organizations (called "CHDOs").

2. Community Development Block Grant (CDBG)

The Community Development Block Grant program⁸ is a federal grant provided to "entitlement communities" (typically municipalities with populations over 50,000 and urban counties with populations over 200,000) and to all states. States may use CDBG funds only in "non-entitlement communities," including rural areas.

During 1999, Congress appropriated \$4.75 billion for the CDBG program. At least 70 percent of CDBG funds must be used to benefit low- and moderate-income people by providing decent housing and a suitable living environment, and by expanding economic opportunities. CDBG can be spent on any of the following activities:

- housing rehabilitation (loans and grants to homeowners, landlords, non-profit organizations, developers);
- new housing construction (only if completed by non-profit groups);
- purchasing land and buildings;
- construction of public facilities, such as shelters for the homeless;
- construction of neighborhood service centers or community buildings;
- code enforcement, demolition, and relocation funds for people displaced because of CDBG projects;
- making buildings accessible to the elderly and handicapped; and
- public services (capped at 15 percent of a jurisdiction's CDB& funds) such as vocational services, healthcare, and childcare.

3. Emergency Shelter Grant (ESG)

Created with the authorization of the Stewart B. McKinney Homeless Assistance Act in 1987, the ESS program provides federal grants to states and localities based on the formula used for the CDBG program.⁹ Program funds *are* awarded to grantees in proportion to their previous year's *CbBG* allocation (see above). If a locality's allocation does not meet minimum grant standards, its funds *are added* to their state's allocation. Each year since 1996 HUD has allocated \$115 million in Emergency Shelter *Grants*. Eligible activities for use of *ESG* include:

- renovation, major rehabilitation, or conversion of buildings for use as emergency shelter;
- up to 30 percent on essential *services* for the homeless;
- up to 30 percent on homeless prevention efforts; and
- shelter operating costs, such as maintenance, insurance, utilities, rent, and furnishings (no more than 10 percent for operating staff costs).

4. Housing Opportunities for People with AIDS Program (HOPWA)

HOPWA is a HUD program that funds housing and services for people with AIDS¹⁰. HOPWA is available as a block grant to states and larger metropolitan areas based on the incidences of AIDS in these areas. " Approximately \$225 million was appropriated for HOPWA in Fiscal Year 1999. Eligible activities under the program include:

- housing information and coordination services;
- acquisition, rehabilitation, and leasing of property;
- project-based or tenant-based rental assistance;
- homeless prevention activities;
- supportive services;
- housing operating costs;
- technical assistance; and/or
- administrative expenses.

WHEN DO CONPLANS NEED TO BE COMPLETED?

Each ConPlan has a "program year" during which the state or locality implements the ConPlan annual one-year action plans. In an effort to better coordinate local planning, HUD allows each state and locality to decide when its program year begins. To find out what the program year and planning schedule is for the ConPlan process in your community, contact your local or state housing or community development officials. Most communities should begin the ConPlan process at least six months prior to the beginning of the new "program year." Given that most localities and states will have new ConPlans approved by HUD during the year 2000, it is particularly important for the disability community to get involved NOW!



WHAT IS HUD'S ROLE IN THE CONPLAN PROCESS?



The law that created the ConPlan gives states and localities the flexibility to develop plans that meet local needs. The current thinking of federal officials is that state and local officials—with good input from citizens and stakeholders—know how to best address the low income housing needs of their communities. The role of the federal government under this approach is to provide funding; mandate an inclusive planning process; review and approve/disapprove the planning documents; and then get out of the way.

Given this approach, it is not always clear who is responsible for monitoring the ConPlan process. Advocates for people with disabilities feel HUD should review the plans more critically. HUD officials have stated that it should be the disability community's role to monitor what is going on in their community and to notify HUD when there is a problem.

This confusion often leads to no one holding state and local governments accountable for the strategies and decisions reflected in the ConPlan. For example, the needs assessment of one state's ConPlan may indicate a large need for rental housing for people with disabilities, yet none of the strategies for using the ConPlan resources are targeted to address this need.

This confusion around monitoring, combined with the latitude given to the states and jurisdictions, has also resulted in many ConPlan processes being far from inclusive or open to the public. Some communities have been very open about the process and have made a real effort to seek public input and participation. Others have regarded the ConPlan as one more bureaucratic requirement from HUD, rather than a legitimate effort to identify and address priority housing needs. In these communities, disability advocates will have to work much harder to find out what is going on and may have more difficulty influencing the outcome.

CHAPTER 2: WHAT IS INCLUDED IN THE CONSOLIDATED PLAN?

Once the disability community understands the importance of the ConPlan, the next step is to learn as much as possible about the document itself and the process used to create it. In particular, it is important to understand what rights citizens, especially people with disabilities, have in influencing what the ConPlan actually says.

WHAT DO I NEED TO KNOW TO GET INVOLVED?

In order to have the biggest impact, the disability community should have a clear understanding of what the ConPlan must include (as required by HUD) versus what decisions *are* left up to the state or localities. The more you know about what information the ConPlan must include, the more successful you will be in influencing the decisions generated from it.¹² There are six required components to the ConPlan which *are* described below.



1. Description of the Planning Process—Citizen Participation and Consultation Requirements

The ConPlan process is based on the idea that state and local governments and citizens, rather than the federal government, should be empowered to make affordable housing and community development decisions for their community. In order to ensure that there is real community participation in the ConPlan process, the federal government sets out minimum requirements regarding citizen participation and consultation with public and private service providers.

The description of the planning process provides *an* overview of how the state or locality prepares the ConPlan, and in particular, how they have met the citizen participation and consultation requirements described below. All efforts made by the state or locality to broaden public participation in the ConPlan process should be described in this section. The disability community should review this section of the ConPlan, as well as the Citizen Participation Plan itself, carefully, and make sure people with disabilities and their advocates *are* able to meaningfully participate in the ConPlan process.

The Citizen Participation Plan

The Citizen Participation Plan is the "road map" for the ConPlan process. HUD requires that each state or locality spell out the process for citizens to participate in the preparation of the ConPlan. The Citizen Participation Plan must "provide for and encourage citizens to participate in the development of the Consolidated Plan and substantial amendments to the Consolidated Plan and performance reports."¹³ The Citizen Participation Plan should include specific steps that will be taken to encourage the participation of all citizens, **including people with disabilities**. A state or locality should be judged on whether its Citizen Participation Plan is really inclusive and if it is followed. Appendix 2 includes a sample Citizen Participation Plan that describes *an* accessible and fair ConPlan process.

Consultation with public and private service providers

In addition to the Citizen Participation Plan, HUD requires that the local or state officials "consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on...persons with disabilities"¹⁴ when preparing the ConPlan.

Unfortunately, the rules do not state at what point or even how this consultation is to be done. This lack of specificity can be a serious problem, especially if the officials preparing the ConPlan are unfamiliar with how health and social services systems are organized. For example, these officials may invite agencies representing only one disability group to a meeting, and then claim to have satisfied this ConPlan requirement.

Given that many HUD programs are designed to serve all people with disabilities rather than targeting one disability group, the disability community should work together to organize a clear strategy and message about the housing needs and housing preferences of all people with disabilities. With this approach, the disability community can take maximum advantage of this consultation requirement. By organizing in this way, the disability community becomes a more powerful force in the housing debate during the preparation of the ConPlan. Without this united approach, local or state officials can ignore organizations representing the interests of people with disabilities because they may not appear to represent a numerically significant or broad-based constituency.

2. Housing and Homeless Needs Assessment

The housing and homeless needs assessment describes the affordable housing needs within the state or locality. These estimates of need must be provided for several population groups including elderly people, single persons, large families, and people with disabilities. The housing needs information is provided for both renters and homeowners. The presentation is organized by income group in the following categories:

- extremely low income (between 0 and 30 percent of area median income);
- * low income (between 30 percent and 50 percent of area median income);
- moderate income (between 50 percent and 80 percent of area median income); and
- middle income (between 80 percent and 95 percent of area median income).

There is also a separate section devoted to homeless persons, and a section that discusses the need for supportive housing for non-homeless people, including: the elderly; frail elderly; people with disabilities (mental, physical, and developmental); persons with alcohol or other drug addictions; persons with HIV/AIDS; public housing residents; and any other categories the state or locality may specify.

The needs assessment is a critically important part of the ConPlan because it should determine which population groups would be given a high priority for housing assistance. The disability community should not wait to be asked by housing officials to provide housing needs data for the ConPlan. Rather, it should be proactive in collecting and providing this information to state or local officials, and should ensure that these data are included in the final plan sent to HUD. To have the greatest impact, data on the housing needs of people with disabilities should be offered to staff preparing the ConPlan **as early as possible** in the process so it is factored into decisions about the ConPlan's priorities and housing strategies.

Homeless and supportive housing needs

The housing needs assessment in the ConPlan is divided into several categories, including separate sections for homeless people and people in need of "supportive" housing. Many ConPlans limit their discussion of the housing needs of people with disabilities to these two categories, and make the erroneous assumption that all people with disabilities *are* either homeless or are in need of housing defined as "supportive" by HUD. City and state staff preparing the ConPlan need to be informed that there *are* many people with disabilities who simply need a decent and affordable place to live or who need affordable housing that is more accessible. These "mainstream" housing needs of people with disabilities *are* often overlooked by housing officials in the ConPlan narrative.

3. Housing Market Analysis

The housing market analysis is a discussion of the significant characteristics of the housing market, including the supply, demand, condition, and cost of housing. It also contains an inventory of affordable housing, including transitional facilities for homeless and supportive housing. The discussion of the housing market should also describe the *barriers* to developing, maintaining, or improving affordable and accessible housing, including current tax policies, zoning ordinances, **and any expected loss of affordable housing from the current inventory.**

The disability community should pay particular attention to whether or not the ConPlan provides a discussion of the affordable housing units lost to people with disabilities due to the implementation of "elderly only" policies in federal housing developments in the community. Often, the loss of access to these units by people with disabilities has not been documented and is overlooked in the housing market analysis.

In many communities across the nation, housing contracts between HUD and private housing developments *are* ending. The owners of these developments *are* not required to *renew these* contracts. By "opting out" of the HUD contract, the owner is no longer required to provide affordable housing and may ask for higher rents, rents comparable to the general market. In many communities, these opt outs *are* resulting in a dramatic loss of affordable housing that was once available to people with disabilities. It is important that this loss of affordable housing also be documented in the housing market analysis of the ConPlan.

Other important factors that should be part of the analysis of the housing market include:

- the cost of housing as compared to the extremely low incomes of people with disabilities;¹⁵
- restrictive zoning that makes the development of affordable rental housing difficult;
- the comparability of HUD's Fair Market Rent level¹⁶ in the community as compared to the income level of people with disabilities;
- the substandard conditions of much of the housing that is considered affordable; and/or
- the location of affordable housing in unsafe or isolated neighborhoods.

4. Development of a Five-Year Strategic Plan

The five-year strategic plan outlines the strategies that a state or locality will use to meet the priority needs for affordable housing and community development identified in the ConPlan. The categories of activities that must be included in the strategic plan are: (1)

affordable housing; (2) homelessness; (3) other special needs (non-homeless), including people with disabilities; and (4) community development activities other than housing.

Officials preparing the ConPlan must "indicate the priorities for allocating investment"¹⁷ and "describe the basis for assigning the priority"¹⁸ to each category of need. Despite these instructions from the federal government, this part of the ConPlan process frequently does not work for the disability community. Even with clear evidence of the affordable housing needs of people with disabilities (i.e., their extremely low incomes, documentation of the significant loss of affordable housing due to "elderly only" tenant selection policies, and so on), many communities do not give high priority to housing strategies that will benefit these constituents.

In other words, the ConPlan fails to require an adequate and enforceable link between the needs identified in the ConPlan and the proposed investment of housing dollars. Unfortunately, despite the efforts of affordable housing advocates, the current policy at HUD is to give maximum *deference* to states and localities in determining their own needs and responding to these needs as they see fit. An important question for the disability community to resolve with the locality, and perhaps HUD, is the point at which local flexibility becomes discrimination. While it is clear that the current level of HUD funding is not sufficient to meet all of the affordable housing needs in any community, it is also clear that people with disabilities should benefit from federal housing funding in proportion to their priority housing needs as identified in the ConPlan. **The disability community should approach local and state officials and HUD if the affordable housing needs of people with disabilities are consistently overlooked when allocating the resources controlled by the ConPlan.**

Despite the shortcomings of the ConPlan, there *are* still many opportunities for the disability community to work to ensure that the ConPlan does include housing strategies that *are* responsive to the housing needs and housing preferences of people with disabilities. Consistent pressure from the disability community will, in the long run, be a more effective strategy than expecting HUD's involvement to make a difference. These strategies will be discussed further in Chapters 4 and 5.

5. Development of a One-Year Action Plan

The one-year Action Plan is a detailed description of how the federal funds available during the next 12 months (i.e., the program year) will be spent consistent with the strategies outlined in the five-year plan. The Action Plan includes a specific breakdown of the number and type of families that will benefit, the specific local housing activities that will be undertaken, and the geographic areas in which the community will direct federal housing assistance.

The ConPlan Action Plan is a blueprint the disability community *can use* to evaluate whether or not any federal housing money controlled by the ConPlan is being spent on housing activities that will benefit people with disabilities. In order to get a true picture of an area's efforts over time, the disability community should look at the annual Action Plans for the past several years in addition to the most recent 12-month period. The disability community can then determine whether the amount allocated to housing activities benefiting people with disabilities appears to be a reasonable or a "fair share" of the funding available over time.

6. Analysis of Impediments to Fair Housing Choice

The ConPlan requires states and localities to sign legally binding certifications to HUD every year, including one stating that the community will "affirmatively further fair housing goals...and maintain records pertaining to carrying out this certification."¹⁹ This means the state or locality must identify impediments to fair housing choice, and take appropriate action to overcome the effects of these impediments. This is a component of the ConPlan that may be particularly helpful to people with disabilities. Specifically, the impediments analysis must include:

- An in-depth examination of a state or locality's laws, regulations, policies and procedures;
- An evaluation of how these laws, etc. impact the availability and accessibility of housing;
- A review of all conditions that affect housing choices; and
- An assessment of the availability of affordable housing units in a variety of sizes and locations.²⁰

Two of the fundamental impediments to fair housing choice for people with disabilities *are* their extremely low incomes and housing discrimination. A comprehensive impediments analysis should identify these facts as barriers that people with disabilities face when trying to locate and access affordable housing.

States and localities must also certify in the ConPlan that all federal housing program activity is in compliance with the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973. These laws both require the community to provide "reasonable accommodation" to people with disabilities during the ConPlan process if requested. Such accommodations might include providing written notice of public hearings to organizations representing people with disabilities, or perhaps providing a training session on the ConPlan process or federal housing programs. The disability community should not hesitate to request these or other accommodations if it will help to make the ConPlan process more accessible to people with disabilities.

REPORTING ON PERFORMANCE



In addition to the ConPlan itself, HUD requires a state or locality to report annually on the progress it has made in carrying out its strategic plan and its action plan. These performance reports *are* submitted to HUD within 90 days after the close of the program year. The performance report can help the disability community determine who is actually benefiting from the federal housing funding available to the community. The performance report should indicate the number and types of families served by income level.

The disability community should pay close attention to these statistics, particularly the information regarding extremely low-income households. These *are* the households whose incomes *are* below 30 percent of median income, which includes virtually all individuals with disabilities who receive SSI benefits. These statistics can help determine whether federally funded housing activities *are* creating affordable housing opportunities for people with disabilities.

SUBSTANTIAL AMENDMENTS

The law that governs the ConPlan process requires that **any** major changes, or "substantial amendments," made to any part of the ConPlan must be managed via the Citizen Participation process. Each state and locality must clearly state in its Citizen Participation Plan what types of modifications will be considered "substantial amendments." This includes any changes made to the one-year action plan, the comprehensive five-year strategic plan, or the Citizen Participation Plan. In *accordance* with the public participation requirements, changes to these documents can only be made after the public has been given the opportunity to review and comment on the proposed modifications.



Neither the law nor HUD guidance clearly defines what a "substantial amendment" is. HUD gives states and localities the authority to decide what changes would qualify as amendments. However, HUD regulations do specifically identify the following amendments:

- A change in the priorities for spending [ConPlan] money;
- A change in the purpose, scope, location, or beneficiaries of an activity;
- A decision to *carry out* an activity not previously described in the Annual Action Plan; and
- A change in the way [ConPlan] funds *are* distributed to various parts of the state or county.²¹

It is important to note the above amendments may not qualify as "substantial" in some states and localities, and therefore it is only required that the public be notified **after** the change has been made.

The importance of this requirement should not be underestimated. Substantial amendments provide a valuable opportunity for the disability community to influence the content of the ConPlan or planning process, even after it has been submitted and approved by HUD. Given this, it is critical that the disability community proactively *engage* the officials in a dialogue around developing a clear definition of changes that constitute "substantial amendments." The sample Citizen Participation Plan in Appendix 2 provides some examples of these types of changes.

THE FIVE STEPS OF THE CONPLAN CALENDAR

1

Identifying Need — The law requires public hearings on housing and community development needs and requires that these hearings take place before the proposed ConPlan is published for public comment. This is the time to provide public testimony on the housing needs of people with disabilities and the time for the disability community to actively engage local housing officials on the housing strategies that would benefit people with disabilities. Consultation with public and private services providers could also occur during the needs assessment process.

Amendments to the ConPlan — The ConPlan must be amended if there are any changes in priorities or uses of money. If there is a substantial amendment, some process for public review and comment is required. HUD allows a jurisdiction to decide what is a substantial change. The disability community should be prepared to request an amendment to the ConPlan if it is determined that the strategies and the action plan do not benefit people with disabilities at all. It is important to remind the local officials that HUD permits ConPlan amendments at any time, provided the correct process is followed.

2

The Proposed ConPlan — HUD requires that the jurisdiction publish the proposed ConPlan for citizen's comment. A summary of the proposed plan must be published in local newspapers, and completed copies must be made available to the public at libraries and government offices. In addition, the jurisdiction must provide a reasonable number of free copies of the plan to citizens and groups that request it. The public must have at least 30 days to review and provide written or oral comments on the proposed ConPlan. A summary of any comments or views offered, but not accepted, and the reasons for their rejection, must be included in the final ConPlan sent to HUD.

4

Annual Performance Report — These reports must be submitted to HUD within 90 days after the close of the "program year." (For example, if a jurisdiction's program year is January 1, 1997 through December 31, 1997 the report for that time period is due by March 31, 1998.) Annual Performance Reports must be available to the public for review and comment on at least 15 days before the report is sent to HUD. The jurisdiction must consider people's comments and attach a summary of them to the report when it is forwarded to HUD officials.

3

The Final ConPlan — The final ConPlan is due at HUD 45 days before the start of the jurisdiction's "program year." HUD can disapprove the final ConPlan if the citizen participation requirements were not followed, if social service agencies were not consulted, if any of the certifications were not accurate, if the ConPlan does not meet the "purposes" of the CDBG or HOME laws, or if the plan fails to satisfy all of HUD's requirements.

CHAPTER 3: WHAT ABOUT ALL THOSE OTHER HUD HOUSING PLANS?

The housing needs and strategies adopted in the ConPlan *are* also intended to influence the development of two other HUD mandated strategic plans—specifically the Continuum of Care Plan which guides the use of HUD McKinney Homeless Assistance Programs and the new Public Housing Agency Plan prepared by Public Housing Agencies.

MOONNEY CONTINUUM OF CARE HOMELESS ASSISTANCE

Since the mid 1990s, funding for HUD's homeless programs has been made available through the Continuum of Care approach—that is a local or statewide network or system designed to coordinate efforts to address homelessness. The Continuum of Care approach is intended to help communities develop the capacity to envision, organize, and plan comprehensive and long-term solutions to address the problem of homelessness in their community. Like the ConPlan, this comprehensive approach encourages communities to prioritize gaps in the housing and services available for homeless people and develop long-term strategies and action plans to *address these gaps* using HUD McKinney funds. There *are* three HUD McKinney programs (Supportive Housing Program, Shelter Plus Care, and Section 8 Mod Rehab SRO) available through the McKinney Homeless Assistance national competition announced each year in HUD's Notice of Funding Availability (known as the HUD SuperNOFA).



Supportive Housing Program (SHP)

The Supportive Housing Program provides supportive housing and/or services to homeless people. SHP funding can be used to create transitional housing (temporary housing and services for up to 24 months), create permanent supportive housing for people with disabilities, or provide supportive services not in conjunction with SHP-funded housing.²²

Shelter Plus Care (S*C)

The Shelter Plus Care program provides rental assistance funding for homeless people with disabilities. This program serves primarily those people with mental illness, chronic problems with alcohol and/or drugs, and AIDS or related diseases. The rental assistance funds *are* matched by supportive services funding provided by the grantee.²³

Section 8 Moderate Rehabilitation Program for Single Room Occupancy (SRO) Dwellings for Homeless Individuals

The Section 8 SRO program provides rental assistance in the development of Single Room Occupancy Dwellings (SROs) for homeless individuals. SRO projects *are* awarded Section 8 project-based rent subsidies for up to 10 years—a long-term commitment that helps the project sponsor obtain other financing necessary to develop the project.²⁴

The McKinney Continuum of *Care* Homeless Assistance approach is directly linked to the ConPlan. In fact, according to the HUD 1999 McKinney Continuum of *Care* application kit, each project funded by HUD through the McKinney Continuum of *Care* planning process is required to submit certification that it is consistent with the ConPlan for that *area*. It is possible that future HUD policies and regulations will strengthen this linkage between the ConPlan and the HUD Continuum of *Care* approach.

PUBLIC HOUSING REFORM AND THE PUBLIC HOUSING AGENCY PLAN

Public Housing Reform

For many years the *federal* government has debated what to do about public housing—and the Public Housing Agencies (also *referred to as* Public Housing Authorities) that run it. This question has been answered, at least for now, by new public housing reform legislation enacted in 1998. Continuing the federal policy that local and state officials—not HUD—know best how to use federal housing funds in the communities, the goal of public housing reform is to give Public Housing Agencies (PHAs) more flexibility and control over how federal public housing and Section 8 funds *are* used. For example, local officials *can* decide to direct more Section 8 funding to households with higher incomes who *are* saving to purchase a home or they can create a preference for very low-income people with disabilities, or both.



Public Housing Agency Plan

Along with this flexibility and control came new requirements, including the creation of a new five-year comprehensive document known as the Public Housing Agency Plan (PHA Plan).²⁵ In the year 2000, each PHA will be required to complete a PHA Plan that describes the agency's overall mission for serving low-income and very low-income individuals and families, and the activities that will be undertaken to meet the housing needs of these households.

In the past, the resources controlled by the PHA Plan, specifically federal public housing and the Section 8 rental assistance programs, were highly regulated by HUD. These programs

including many people with disabilities. They *are* HUD's major programs for assisting these households to rent decent, safe, and sanitary housing in the community. Section 8 and public housing allow people with limited incomes to obtain housing without spending the majority of their income on rent. The new PHA Plan will be used by PHAs to describe their strategies for using these resources to address the needs of low-income and very low-income people, including people with disabilities. For example, a PHA will be required to state in its PHA Plan if it will designate any of its public housing units as "elderly only" or if it will apply for any Section 8 Mainstream funding targeted to people with disabilities.

In consultation with a newly-created Resident Advisory Board, each PHA will be developing their first PHA Plan during 2000, including a statement on the housing needs of low- and very low-income people in the community and how the PHA will meet those needs. When federal officials created the PHA Plan they also linked it to the ConPlan. According to HUD's PHA Plan Interim Rule, "the PHA must ensure that its Annual Plan is consistent with the Consolidated Plan for the jurisdiction in which the PHA is located."²⁶ Specifically, the needs, goals, and activities detailed in the PHA Plan must reflect the needs and priorities documented in the ConPlan. In fact, PHAs can use the data provided in the ConPlan to develop the PHA Plan, rather than conducting their own needs *assessment* for the community.

What does this all mean for people with disabilities and their housing advocates? Disability advocates are very concerned that the link between the ConPlan and the PHA Plan will mean that people with disabilities will have less—not *more*—access to affordable housing in local communities. There *are* valid reasons for concern because most ConPlans do not accurately describe the acute housing crisis experienced by people with disabilities. Unfortunately, many state and local ConPlans contain inaccurate or incomplete data, particularly with regard to the housing needs of people with disabilities. Housing strategies in the ConPlan often do not address the housing needs of people with disabilities. With future funding for housing at stake, it is critically important that the housing crisis confronting people with disabilities be accurately described in both the ConPlan and the PHA Plan. Given the linkage between the PHA Plan and the ConPlan it is possible that if the needs of people with disabilities *are* not reflected in the ConPlan they will also be overlooked in the PHA Plan.

CHAPTER 4: HOW CAN THE DISABILITY COMMUNITY SET INVOLVED?

The ConPlan process is meant to be comprehensive and tailored to meet housing needs at the local level. It is an invaluable mechanism for both documenting the housing crisis facing people with disabilities and accessing federal housing resources. In order to be an active participant in the process, the disability community needs to:

- 👉 **Get organized** and have a clear and singular message about the different types of housing needed by people with disabilities as well as their housing preferences;
- 👉 **Learn the basics** of the ConPlan process including how HUD housing dollars (i.e., CDBG, HOME, ESG, and HOPW/4 funds) can be used, and how to get involved *before* decisions on housing strategies are actually made;
- 👉 **Actively participate** in the ConPlan process and react to all critical documents;
- 👉 **Document the need** for affordable housing among people with disabilities;
- 👉 **Analyze the housing market** by gathering accurate data regarding the current housing market. This includes an inventory of available housing resources;
- 👉 **Identify all barriers** to accessing affordable housing people with disabilities face; and
- 👉 **Develop strategies** that work and specific proposals for how ConPlan resources can be used alone, or in partnership with other federal programs, to successfully expand housing opportunities for people with disabilities (discussed in Chapter 5).

GET ORGANIZED

Because most HUD programs *are* targeted to **all** people with disabilities, it is important that providers and advocates serving people with all types of disabilities come together to develop an overall strategy for engaging local or state housing officials in the entire ConPlan process. These efforts should include the identification of specific and realistic strategies for the use of federal housing funds to benefit **all** people with disabilities.

Organizing the disability community to get involved in the ConPlan takes time and effort. Communities undertaking this should allow themselves the time to lay the right groundwork in terms of community process, data collection, and analysis. This will *earn* community buy-in and translate into material improvements in the disability system and the lives of people with disabilities.

The disability community could form a Core Working Group with an overall focus on expanding affordable housing opportunities, specifically through involvement in the development of the ConPlan. The group should develop a mission statement and identify goals, objectives, and action steps—such as reviewing the past ConPlans for the community or providing comments on the ConPlan draft at the public hearing—to accomplish these goals.



The working group should be as inclusive as possible, ensuring that essential consumers, providers, and other powerful stakeholders (e.g. business leaders, public officials, service provider networks, housing agencies) are engaged in the process from the beginning to maximize the level of involvement and legitimacy. Much of the success of the efforts will rest on the cooperation of policy makers and funders. If these stakeholders are not directly involved, they should be kept aware of the planning process and progress.

These organizing efforts should be conducted in the context of other related community planning activities, in particular the Continuum of Care and the development of the new PHA Plan. This is to ensure that priority activities and strategies in other housing plans are consistent with the Core Working Group's objectives.

LEARN THE BASICS

After developing a clear and singular message, the next step to getting involved in the ConPlan process is to have a picture of how the process works for your community or area. First, the disability community should find out if your local government receives federal housing funding directly from HUD and is required to have a ConPlan. It is important to find out who has the lead role in preparing the ConPlan and developing the schedule for the process. This can be done by calling the Chief Executive of the community or the planning/community development department of the local government. If the community does not have a ConPlan then contact the state's housing and/or community development department in order to get involved.



The disability community should also make sure to get a copy of the most *recent* ConPlan from these state or local officials. They should become familiar with both the content and the format of the ConPlan. The critical pieces of information to find out are:

- the ConPlan "program year;"
- when the next plan will be prepared;
- the schedule for public hearings; and
- the consultation requirements.

The public is entitled to access **all** information relevant to the ConPlan. It is important to make sure that you *receive a complete* copy of the ConPlan since often housing officials only distribute select sections, such as a list of projects that were funded in the past using ConPlan resources. HUD requires that a copy of the complete ConPlan be made available to the public, free of charge, within two working days of a request.

Access all Relevant Information

Through the ConPlan process, HUD requires that housing officials not only listen to the needs of the community, but also respond to those needs, and be accountable for their actions. This accountability is the foundation for many of the HUD requirements around public participation, including the public's access to information.

According to the law that created the ConPlan, the public must be given "reasonable" and "timely" access to all key information and records. This could include information such as data regarding how the ConPlan resources have been spent in the past or how it will be spent in the future. For past activities, the law limits the public's access to these records to the past five years.

Unfortunately, HUD allows states and localities to decide how these documents will be made available to the public, and therefore the needs of people with disabilities may be overlooked. However, HUD does state that all key information and records must be made available "in a form accessible to persons with disabilities, upon request."²⁷ The disability community should use this HUD regulation to ensure that people with disabilities *are* truly able to access ConPlan information. For example, copies of the ConPlan and the Citizen Participation Plan should be made available in facilities that *are* accessible by people with physical impairments.

Review the documents

The law that mandates the creation of the ConPlan also requires that officials developing the plan "notify" the public that information is available and allow citizens to "examine" the document so they may provide informed feedback. This requirement applies to almost all documents related to the ConPlan including:

- the five-year comprehensive document;
- the one-year Action Plan;
- the annual performance reports;
- the Citizen Participation Plan; and
- any substantial amendments made to the ConPlan.

Unfortunately, although the law requires that the public be notified about the ConPlan and be allowed to review it, housing officials developing the plan *are* given latitude to determine how the public will be notified, when, and how they will distribute copies of the documents to the public.

Set a copy of the Citizen Participation Plan

According to HUD regulations, a critical part of the ConPlan process is active input and feedback from the community, including people with disabilities. In the winter of 1999, HUD re-emphasized the importance of the involvement of the disability community in the ConPlan process through a memo from the HUD Secretary to all HUD Field Offices²⁸ that stated:

It is critical that persons with disabilities and their housing needs be fully considered in every jurisdiction we serve. To do so, we must reach out to persons with disabilities and their chosen advocates and hear their perspectives. I want to remind you that each jurisdiction is required to (1) include persons with disabilities in the Consolidated Plan development process and (2) include data regarding housing needs of persons with disabilities.

One of the first steps the disability community should take is to carefully analyze the Citizen Participation Plan since it describes the overall process for developing the ConPlan and is a key element for determining when, where, and how the disability community can be involved. First, contact officials in the housing or community development departments in

your community and request a copy of the Citizen Participation Plan. This document should be readily available and a limited number of copies should be free of charge. Make sure that the copy of the Citizen Participation Plan is complete and does not just provide excerpts. Appendix 2 provides a sample Citizen Participation Plan.

Second, the Citizen Participation Plan should be reviewed to ensure that the ConPlan process is **truly** accessible to people with disabilities and is in accordance with the required timeline. For example, *are* public hearings broadly advertised? *Are* they held in wheelchair-accessible facilities and *are* interpreters available when needed? Is there *an* easy process for requesting a draft copy of the Consolidated Plan made available in different formats, such as in large print, if *needed*? If the Citizen Participation Plan does not describe a planning process that is truly accessible to people with disabilities, but rather one that barely meets HUD requirements, arrange a meeting with local officials to discuss your concerns. At the meeting suggest specific reasonable accommodations that could be made to ensure more participation by the disability community. For example, the disability community could require that written notice of all ConPlan activities be mailed to non-profit disability organizations and service providers.

Obtain and review ConPlan performance reports

As mentioned earlier, in addition to developing the actual ConPlan, HUD requires each jurisdiction to report annually on the progress it has made in carrying out the activities laid out in its strategic plan. These performance reports can help the disability community determine 'who is actually benefiting from the federal housing funding provided by HUD. The report should indicate the number and types of families served by income level, including extremely low-income, very low-income, low-income, moderate-income, and middle-income households.

People with disabilities, their advocates, and families should get a copy of recent ConPlan Performance Reports and ask for assistance, if *necessary*, in understanding the housing activities that have been paid for with federal housing funds. Pay close attention to the statistics included in the performance reports, particularly the information regarding extremely low-income households, which represents virtually all people with disabilities receiving SSI benefits. These statistics can help determine whether the jurisdiction's federally funded housing activities *are* creating affordable housing opportunities for people with disabilities with very low incomes.

PARTICIPATE AND REACT

Before the ConPlan can be finalized, the law requires that the community have a chance to review the draft plan and comment on it. A limited number of free copies of the draft must be made available in public settings, such as libraries and government offices. Also, the law requires that the draft plan be made available in locations and formats that *are* easily accessible by people with disabilities. Some examples of ways to ensure that the draft ConPlan is accessible to people with disabilities include distributing copies in wheelchair-accessible buildings or making alternate versions of the draft Plan available, such as in Braille.



After the public reviews the ConPlan draft, they are given the opportunity to make public comments both in writing and at a public hearing. HUD requires each state and locality that completes a ConPlan to describe in the Citizen Participation Plan the policies for receiving and processing written and oral comments from the public regarding: the content of the ConPlan, the overall ConPlan process, or the Annual Performance Report.

Submit Written Comments

HUD requirements say, that at a minimum, every written complaint must be answered with a "timely" and meaningful written response, and that all comments must be "considered" by officials. A summary of all comments must be included as a part of the final submission to HUD. If the state or locality receives CDBG funds, then "timely" is defined as 15 working days.

HUD leaves a lot of discretion to the officials developing the ConPlan to define what a "meaningful" response is and how to deal with oral complaints. The disability community should not be discouraged by this fact since HUD procedures emphasize the importance of all comments and complaints. In fact, HUD requires its Field Office staff to review a summary of all comments and complaints before determining whether the ConPlan is complete.

Attend Public Hearings and Give Feedback

In order to solicit feedback from the community regarding the content of the ConPlan, the planning process requires that the housing officials developing the plan hold public hearings. It is at these hearings that citizens from the community are given the opportunity to comment on the various parts of the ConPlan including its content or the planning process itself. These public hearings provide a critical opportunity for the disability community to make an impact on public officials present since comments made during the public hearings are recorded and required to be submitted to HUD as part of the final plan.

The law regarding ConPlan public hearings states that they must be held throughout the ConPlan process. Specifically, the public must be able to provide information and comment on:

- the housing and community development needs in the community;
- the proposed activities to be funded with the ConPlan resources; and
- the performance of the state or locality using the ConPlan funds.

The regulations also allow the states and localities to limit the public hearings to only one (for states) or two (for localities) throughout the process.

Even though the regulations allow states and participating jurisdictions to limit the number of public hearings, the disability community should maximize this opportunity to give feedback and testimony regarding the housing crisis facing people with disabilities and the role of the state and local housing officials in addressing their needs. Unfortunately, in practice, many officials lump together a public hearing on last year's performance with next year's activities. By doing this, the officials spend only a limited time on each topic and create so much confusion that the public is discouraged from participating. Thus, the disability community needs to try hard to convince the housing officials to provide additional public hearings at different stages in the planning process and to encourage a clear focus and agenda for each hearing.

Regardless of how many public hearings there are, the disability community should prepare for the hearings and plan to have a number of individuals speak. Specifically, the disability community should make sure to:

- state the housing needs of people with disabilities clearly;
- comment on the past performance of the state or locality in funding activities that address these needs; and
- make specific recommendations for how to use ConPlan funds to expand housing for people with disabilities.

Utilize the "Substantial Amendments" Requirement

As described in Chapter 2, substantial amendments *are* those changes made to the ConPlan that are large enough in scope that they require public feedback before implementing. These amendments provide an invaluable opportunity for the disability community to influence the content of the ConPlan even **after** it has been submitted and approved by HUD. Also discussed earlier was the latitude given to states and localities in defining which changes constitute "substantial" modifications, thus enabling them to limit the input from the public when making certain types of changes.

There *are* two ways the disability community *can* utilize the "substantial amendments" requirement of the Consolidated Plan. First, disability advocates should encourage housing officials to use a broad definition when defining which changes to the ConPlan would be considered "substantial" enough to require community input. Some examples of substantial amendments that would help the disability community influence the ConPlan include:

- a change in the type of people benefiting from an activity including changes in income levels, race or ethnicity, or size of household;
- a decrease in the number of people with disabilities benefiting from ConPlan activities; or
- a *decrease* in the number of extremely low- or low-income people benefiting from ConPlan activities.

Second, the disability community should request a substantial amendment to the ConPlan if it does not meet all the HUD requirements. For example, if a ConPlan does not provide any information on the housing needs of homeless people, misrepresents the housing needs of people with disabilities, or otherwise discriminates against people with disabilities, **and** the ConPlan has already been finalized and approved by HUD, the disability community should seek a substantial amendment to the ConPlan. To do this, the disability community should meet with the officials who developed the ConPlan, present with them with the complaints in writing, and provide ways the ConPlan could be modified. The disability community may need to seek HUD's assistance if these officials *are* uncooperative and unwilling to make the necessary changes.

File Complaints with HUD

Over the years, low income housing advocates and advocates for people with disabilities have been concerned that the ConPlan does not require local housing officials to address the most urgent housing needs in local communities and have expressed these concerns to HUD

and to Congress. However, despite the urging of these advocates and people with disabilities, HUD rarely disapproves a ConPlan submitted for its approval even if there have been complaints or negative comments submitted.

Unfortunately, HUD officials *are* likely to use their power to disapprove a ConPlan only when strong evidence is produced as to why disapproval is *necessary*. It is important that the disability community carefully review the testimony given at the public hearings, the consultation process with public and private service agencies, and the responses of housing officials to citizens' comments that were **not** taken into consideration during the process. It is also important to review and document the jurisdiction's "track record" on housing for people with disabilities over several years, rather than for a one- or even two-year period.

If local housing officials consistently refuse to consider the housing needs of people with disabilities year after year, then there may be sufficient evidence to attract HUD's attention. Currently there is no formal process for filing a complaint regarding the ConPlan (or related documents) with HUD. The disability community should feel free to submit a complaint nonetheless. Do not be afraid to raise these issues with HUD. Write to the HUD *Secretary's* Representative and express your concerns. Make sure to send a copy of the complaint to the HUD *Office of Fair Housing* and the Senior Community Builder in the local HUD Field Office. Without the disability community's willingness to document and call attention to the problem, HUD will never know a problem exists. It is surprising how many communities decide to cooperate once HUD is involved.

DOCUMENT THE NEED

The housing and homeless needs assessment section of the ConPlan describes the affordable housing needs within the jurisdiction. For the ConPlan, these estimates of need must be provided for several population groups, and be organized by income group. The needs assessment is a critically important part of the ConPlan because it **should** determine which population groups (among the many eligible for HUD programs) will be given a high priority for housing assistance.



As stated earlier, the disability community should pay close attention to the data included in the ConPlan needs assessment, particularly the information regarding extremely low-income households which includes virtually all individuals with disabilities who receive SSI benefits. As discussed in Chapter 2, the disability community also needs to ensure that officials preparing the ConPlan do not assume that people with disabilities *are* either homeless or in need of supportive housing. It is important that the disability community check to make sure that these "mainstream" housing needs of people with disabilities (i.e., Section 8 and public housing) *are* not overlooked in the ConPlan narrative.

Write an Effective Needs Statement

Disability advocates should approach housing officials with a clear picture of the housing needs of people with disabilities. The disability community should take the lead in collecting and providing housing needs information to the appropriate officials, and should ensure that

these data are included in the final ConPlan sent to HUD. To have the greatest impact, data on the housing needs of people with disabilities should be offered to staff preparing the ConPlan **as early as possible** in the process so that this information is factored into decisions about the ConPlan's priorities and housing strategies.

There is no one correct way to *assess need*. Sources *and* methods that different communities employ vary depending on the size of the community, complexity of the populations, capacity of providers, and whether there are established mechanisms for collecting needs data, such as activities associated with a community's Continuum of Care application.

Regardless of the methodology used to gather the data, good estimates of need *are* sufficient for documenting the problem. It is important that the needs statement describe the housing needs of all people with disabilities. Given that ConPlan regulations require there to be a special section on the needs of people with disabilities who *are* homeless or in need of supportive housing, no one should be overlooked. The needs statement should also describe the needs of people with disabilities in residential settings, such as group homes, who may desire more independent housing options.

Whenever possible, the disability community should use existing sources to provide data regarding the housing needs of people with disabilities to the officials developing the ConPlan and the PHA Plan. For example, Priced Out in 1998, a publication by TAC and the Consortium for Citizens with Disabilities Housing Task Force,²⁹ provides documentation of the *extreme* housing crisis that people with disabilities receiving SSI confront in communities *across* the nation. Other policy and research reports, including reports published by the Social Security Administration and national advocacy organizations, contain data regarding the need for affordable housing for people with disabilities. The disability community should consult the local library and advocacy agencies, and use the Internet to find other available sources.

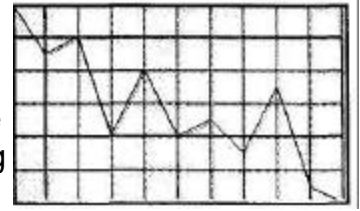
The disability community can also utilize data from management information systems of service providers to document the need for housing among the people they serve. Useful information includes the number of people on the waiting list for residential services or PHA housing assistance (including public housing and Section 8); the number of people who *are* living at home with aging parents, homeless, rent burdened, "doubled up" or living in substandard housing. Service providers should be asking these questions in order to develop comprehensive housing needs data.

Finally, disability providers *can* hold focus groups with people with disabilities to solicit information about their housing needs. This method of gathering information may be more labor-intensive and time-consuming, but the qualitative information *received* from people with disabilities combined with the quantitative data from management information systems or other sources provides a compelling picture of the housing crisis facing people with disabilities.

Appendix 4 provides a sample assessment of the housing needs of people with psychiatric and developmental disabilities in *an* urban county in the Midwestern US. This assessment can be used by the disability community *as a* model for developing a needs statement.

Analyze the Housing Market

The disability community should be sure that this section of the ConPlan points out the current factors that contribute to the housing crisis facing people with disabilities. The loss of federal housing available for people with disabilities due to the implementation of "elderly only" housing policies is of significant importance. Recent federal data show that over 50 percent of privately owned HUD assisted housing projects have adopted some *preference* for elderly people.³⁰ Due to these "elderly only" housing policies, TAC and the Consortium for Citizens with Disabilities Housing Task Force have estimated that approximately 273,000 apartments in federally subsidized elderly/disabled housing buildings will no longer be available to people with disabilities under age 62 by the year 2000.³¹



Document the Loss of Affordable Housing Due to "Elderly Only" Housing Designation

The disability community should **insist** that local officials preparing the ConPlan include a discussion of the designation of "elderly only" housing in the housing market analysis. HUD's ConPlan guidelines state that the community must include *an* assessment of whether any federally assisted units *are* "expected to be lost from the assisted housing inventory **for any reason**"³² [emphasis added].

In responding to this requirement, housing officials preparing the ConPlan will focus attention *on* the physical loss of housing units, such as the demolition of public housing buildings, or on the loss of affordability, such as the expiration of project-based Section 8 contracts in some assisted housing developments. Without the disability community's advocacy and involvement, staff preparing the ConPlan *are* unlikely to *recognize* that "elderly only" tenant selection policies in federal public and assisted housing constitute a real "loss" of units for people with disabilities.

To quantify the loss of federally funded public housing, people with disabilities or their advocates should contact the local PHA or HUD to see if the PHA has a HUD-approved PHA Allocation Plan to designate "elderly only" housing, or if it has any plans to do. The upcoming PHA Plan must include a discussion of plans to designate any housing and will be a good source of information for the disability community in the future. If there is *an* approved Allocation Plan, the number of units that *are* now available exclusively to elderly households represents the loss of housing for people with disabilities. [NOTE: HUD has approved over 120 Allocation Plans thus far, with a loss of over 46,000 units nationally. You *can review* HUD data regarding these Allocation Plans at www.hud.gov/pih/sac/sachome.html].

Documenting the loss of privately owned HUD assisted housing is more difficult because HUD does not require owners of this housing to report this information. However, if there *are any* HUD-assisted housing developments that no longer accept applications from people with disabilities, or limit the number of units available, the disability community should document this fact during the ConPlan process. If possible, the disability community should

organize a survey of all privately owned HUD-assisted housing in the area to determine which properties are no longer available to people with disabilities and provide this information to the staff preparing the draft ConPlan. A list of HUD assisted properties should be available through the local HUD Field Office.

Inventory Existing Resources

The approach used during the ConPlan process to inventory existing resources will vary depending on the size and complexity of the housing system in the community, but the disability community should ensure that the inventory is comprehensive and accurate. The inventory of capacity and resources should include a look at resources that lie outside of the traditional housing system, such as those resources typically accessed by people with disabilities, including group homes and other residential settings.

It should also include "mainstream" affordable housing resources, such as conventional public housing, Section 8, other rental subsidy programs, and other affordable housing and community development resources available in the community. Data available at HUD's web site³³ can provide a picture of how many people with disabilities *are* currently utilizing Section 8 subsidies or *are* residing in public housing in a particular community. The disability community should ensure that the information contained in the ConPlan inventory includes this type of data.

IDENTIFY BARRIERS

As stated earlier, there *are* two fundamental impediments to fair housing choice for people with disabilities: their extremely low incomes, and the discrimination they face in accessing affordable housing. The disability community should make sure that a state or locality's impediment analysis clearly documents these facts as significant *barriers* to people with disabilities to access housing in the community.



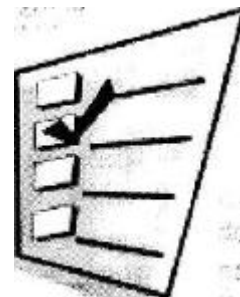
The disability community should make sure that the ConPlan clearly identifies the many ways people with disabilities *are* discriminated against in their attempts to access housing in the community. This discrimination may include:

- individual landlords refusing to rent to people with disabilities because of their disability;
- neighborhood opposition to the development of affordable housing for people with disabilities;
- a lack of physically accessible housing; and
- the unwillingness of housing providers to make reasonable accommodations for people with disabilities.

If the state or locality has not identified these impediments and/or has not formulated a plan to overcome them, the disability community can challenge the community's approach, and request that HUD instruct them to undertake a more comprehensive analysis of the impediments to fair housing choice.

CHAPTER 5: STRATEGIES THAT WORK

In order to have the maximum impact on the ConPlan process, the disability community should identify concrete housing strategies and recommendations. They should also be prepared to present these recommendations to officials developing the ConPlan. It is important that the disability community think "outside the box" when developing these recommendations—using both "mainstream" ConPlan programs (e.g. HOME, CDBG, ESG, and HOPWA programs) as well as other resources which *can* be targeted to people with a disabilities who *are* in need of affordable housing. Disability housing advocates should also keep in mind that most HUD housing programs *are* targeted to **all** people with disabilities. For this reason, partnerships and joint advocacy efforts with organizations that serve other disability populations *are* often helpful when trying to engage the housing officials that control the ConPlan process.



When developing strategies to obtain resources controlled by the ConPlan, it is necessary to have a good understanding of exactly how HOME, CDBG, ESG and HOPWA funds can best be used to expand housing—in other words, to not only know how they can be utilized, but also how they cannot. For example, HOME funds can be used for tenant-based rent subsidies, but cannot be used for project-based rent subsidies or for project operating subsidies. After reviewing this guidebook, if disability housing advocates have questions about how HUD resources *can* be used, they can request technical assistance from the staff preparing the ConPlan or contact HUD Community Builder staff through the local HUD Field Office.

It is also important to develop strategies that are **feasible** and that *can* work in the current housing environment. For example, HOME funded tenant-based rental assistance resources will not be effective if there is very little rental housing in the *area*. Similarly, targeting HOME funds for the acquisition and rehabilitation of rental housing will be problematic unless there is an organization with the expertise and *experience* to "make the project happen." Remember, there *are* other organizations competing for these funds. You must be able to demonstrate the capacity to successfully carry out a feasible project.

Below *are* some examples of creative strategies addressing the housing needs of people with disabilities. These examples *are* designed to illustrate how resources controlled by the ConPlan *can be* used—frequently in combination with other HUD housing programs—to respond to the housing crisis experienced by all people with disabilities who have extremely low incomes.

STRATEGIES FOR ENGAGING HOUSING OFFICIALS RESPONSIBLE FOR PREPARING THE CONPLAN

Many state and local housing officials have had little experience with the disability community concerning the actual development of housing strategies. However, as more and more people with disabilities confront *an* affordable housing crisis, it is important for the disability community to begin to assertively *engage* housing officials at all levels of

government. Unfortunately, some housing officials regard federal housing funds controlled by the ConPlan as "their" money-and are reluctant to change how they spend it. In these communities, disability advocates will have to work much harder to establish working partnerships with these officials. Examples of ways to *engage* state and local housing and community officials are described below.

Requesting Assistance from HUD



Three years ago, the disability community in a large city established a Housing Task Force and developed a list of funding strategies and priorities for people with disabilities using ConPlan resources. After considering all of the options, the Task Force recommended that HOME funds be used to establish a rental assistance program for people with disabilities. Since the Task Force was created, members have provided oral testimony and submitted written comments each year during the ConPlan process, requesting that HOME funds be set-aside for this purpose. Two years ago, the Task Force expanded to include other disability organizations not previously involved, including people with physical disabilities and people with HIV/AIDS.

Working together, these organizations have repeatedly requested that the community's HOME funds be used to provide rental assistance. They have encouraged people with disabilities and their families to attend and speak out at ConPlan public hearings, and have met frequently with housing officials, including a meeting one year ago with the Director of the city's Housing Department.

After several years of frustration and no action from the city, the Housing Task Force decided that it was time to get HUD involved. Carrying written proof of the city's history of ignoring the needs of people with disabilities when developing the ConPlan, the group met with HUD Community Builder staff and requested their assistance. Task force members were able to document to HUD that the city's ConPlan described the priority housing needs of people with disabilities, but made no investment in ConPlan resources to address these needs. *HUD staff were impressed by the efforts of the Housing Task Force, and agreed to engage city officials in a dialogue.*

City officials soon learned about the HUD meeting, and became concerned that their relationships with HUD officials might be affected. They invited the Housing Task Force to a meeting, and, after much discussion, agreed that a rental assistance strategy using HOME funds would greatly assist people with disabilities with their housing problems. It was also *agreed* that the PHA would be the appropriate agency to administer the program. During the preparation of the next ConPlan Annual Action Plan, city officials included a substantial amendment to the ConPlan, which created a HOME funded tenant-based rental assistance program. The program now provides 25 people with disabilities with a two-year renewable rent subsidy.



Using the ConPlan Process to Influence the PHA Plan

A county Department of Public Health that provides *services* for people with developmental disabilities has spent the past few years providing testimony at its local ConPlan hearings and advocating for its "fair share" of resources for people with disabilities. It has succeeded in getting *accurate*

needs data put into the ConPlan, but has not been successful at getting housing resources targeted to people with developmental disabilities. While attending a state housing conference, the staff from a non-profit service provider learned about a new HUD planning process called the PHA Plan. In particular, they learned that the new PHA Plan would determine which low-income households would be given *preference* for assistance in the PHA's Section 8 program. The non-profit staff immediately informed the Housing Specialist of the Department of Public Health of this new housing policy that might impact all people with disabilities, including people with developmental disabilities.

Using the housing needs data developed for the ConPlan process, the Housing Specialist met with the Director of the PHA and, after much discussion, convinced her to conduct a review of the PHA's Section 8 and public housing programs to determine the number of people with disabilities being assisted in these programs. This review indicated that people with disabilities were probably being "steered" away from the PHA's public housing waiting lists by PHA staff. The PHA Director also was surprised to learn that 25 percent of the households on the Section 8 waiting list were people with disabilities. The Housing Specialist of the Department of Public Health then made two written recommendations regarding the PHA Plan to the PHA Director. They were: (1) to establish a *preference* in its Section 8 program for people with disabilities; and (2) to apply to HUD for the Section 8 Mainstream Program for People with Disabilities.

When the draft PHA Plan was published for public comment several months later, it included a strong housing needs assessment of people with developmental disabilities and other disabilities which was taken primarily from the ConPlan information supplied by the county Department of Public Health. The PHA Plan as drafted did not include a proposal to *create a preference* on the Section 8 program for people with disabilities. However, the PHA Plan did specifically state the PHA's commitment to apply to HUD for the maximum amount of Section 8 vouchers allowable under the Mainstream Program, and to *engage* in additional discussions regarding the increasing use of HOME tenant-based rental assistance funds. All parties involved agreed that this was a good first step in creating a partnership between the disability community and the PHA.

Building Non-Profit Capacity Using ConPlan Resources



The largest non-profit agency in the city serving people with psychiatric disabilities has recently decided to expand its mission statement to include the goal of expanding housing opportunities for their consumers. This change was a result of a recent needs assessment conducted by the agency that documented that the top *concern* among people with psychiatric disabilities was finding decent and affordable housing. A key factor in the non-profit agency's decision to take on housing activities was also the lack of capacity of the community's PHA, which was considered a "troubled" PHA by HUD.

It was recognized that this non-profit had very limited prior housing experience although they had a good track record administering HUD funds. For example, several years ago the agency had received CDBG funding to help renovate a mental health clubhouse program. They also administered a three year McKinney SHP grant to provide supportive *services* to



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complexes were not very forthcoming about the *reasons* why, except to say it was because of "a new HUD rule."

After calling HUD and several housing advocacy organizations, the group was able to piece together that, in fact, there was a new federal housing policy that could restrict housing previously available to people with disabilities to now house only elderly households. At least 200 units in the community had been converted to "elderly only" housing. They also learned that the local PHA was intending to create "elderly only" housing and "disabled only" housing, which was also permitted by the new HUD rule. Not surprisingly, the "disabled only" housing was to be located in the worst public housing project located in a run-down neighborhood with a high crime rate. *

Armed with the data regarding the need for affordable housing among people with disabilities and the loss of available affordable housing units, the group requested a meeting with the Director of the PHA and the city's ConPlan staff. At this meeting, the group reviewed two critical policies. First, they learned the PHA could not designate "elderly only" or "disabled only" housing unless that designation was consistent with the HUD-approved ConPlan. Second, they found the most recent ConPlan had no discussion of creating "disabled only" housing, but rather emphasized housing programs for people with disabilities that were developed through a scattered site approach—specifically through the Section 8 and Shelter Plus *Care* tenant-based rental assistance programs. Faced with this information, and the strong opposition from the disability community, the PHA agreed to modify its plans. While they still intend to move forward with the designation of "elderly only" public housing, they withdrew their proposal to create any "disabled only" housing. Instead they decided to seek HUD HOPE VI funds to re-develop the deteriorated public housing project, and seek Section 8 vouchers to offset the loss of housing for people with disabilities that occurred from the implementation of "elderly only" housing policies.

Accessing New Housing Developed with HOME Funds



A woman with a *psychiatric* disability lived at home *with her mother* for many years. After talking about it for sometime, the mother and daughter decided that it was time for the daughter to live independently in the community. The daughter had a social worker whom she met with regularly who also felt the daughter was more than ready to live in her own apartment. The major barrier to this move seemed to be her lack of income to afford a modest apartment. The daughter only received \$500 each month in SSI benefits and the mother was in no position to assist her daughter financially. In fact, the loss of the daughter's income to the household would be a hardship for her mother, because the daughter regularly paid the heat and electric bills.

As *the* mother, daughter, and social worker began to look for appropriate and affordable housing, the housing crisis facing people with disabilities became a reality for this family.

Many landlords in the private market were asking \$400 a month (or 76 percent of the daughter's income) for a small studio apartment!

After weeks of searching without success, the mother decided to call the city's housing department. After many phone calls and conversations, the mother learned that housing developed using certain types of federal funding controlled by the ConPlan process—particularly HOME funds—must have a percentage of affordable units. After calling the officials at the local housing department multiple times, the mother was finally able to get a list of some of those properties in the community developed with HOME funds. They contacted these properties and were surprised to learn that studio units were renting for \$200 per month and that—because of their small size—there were very few people on the waiting list for these units. Within 6 months the daughter had moved into her own studio apartment.

During her many conversations with city housing staff, the mother learned about the availability of HUD funds for emergency assistance for low-income people to pay heating bills during the winter months. This fact helped the mother develop a plan to apply for these funds for the following winter.

CONCLUSION

Across the nation, people with disabilities *are* facing a housing crisis. The combination of limited incomes, community discrimination, and the reduction in affordable housing units has made it virtually impossible for people with disabilities to locate and obtain safe and decent housing. In this day and age, the resources controlled by the ConPlan have become invaluable in expanding housing opportunities for people with disabilities.

Since the creation of the ConPlan in the early 1990s, housing and disability advocates have struggled to decipher the planning process so they *can* effectively *access* the housing and community development funds. This guidebook should provide the disability community with the information and tools necessary to engage state and local housing officials in a meaningful discussion about addressing the affordable housing needs of people with disabilities.

With the development of the new five-year ConPlans, and the PHA Plans, during the year 2000, it is important that the disability community use these tools to start influencing their *area's* planning process right now! The best approach is to get involved early and often in the process. Join with other disability advocates, get informed, and develop *an* overall strategy for influencing the process. Provide the housing officials with accurate and comprehensive needs data and information about the current housing market in that state or locality. Develop specific strategies for using the ConPlan resources to expand housing opportunities for people with disabilities. Most importantly, let local officials know that the disability community takes the ConPlan process seriously, that you will monitor their actions and responses carefully, and that you intend to take action if your recommendations *are* totally ignored. Don't stand on the sidelines and miss out!

CITATIONS

The authors of this guidebook wish to thank Ed Gramlich of the Center for Community Change and the US Department of Housing and Urban Development for allowing us to use materials from their publications HUD's Consolidated Plan and Guide to Continuum of Care Planning and Implementation, respectively.

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1. Further information regarding the Consolidated Plan is available at HUD's web site at www.hud.gov/progdesc/conplan.html
2. Priced Out in 1998: The Housing Crisis for People with Disabilities. Edgar, Elizabeth; et al. Technical Assistance Collaborative and Consortium for Citizens with Disabilities Housing Task Force. Boston: 1999.
3. Referred to in this guidebook as a "locality."
4. Generally, cities with populations greater than 50,000 and urban counties with populations greater than 250,000 receive federal housing and/or community development funding directly from HUD.
5. Summaries of selected ConPlans are available on the HUD web site at www.hud.gov/states.html
6. HUD's Community Planning and Development (CPD) Office administer all of the resources controlled by the ConPlan. Visit the CPD web site at www.hud.gov/cpd/cpdhome.html
7. The HOME program was authorized by Title II of the Cranston-Gonzalez National Affordable Housing Act and is governed by HUD regulations 24 CFR Section 92. Further information regarding the HOME program is available on line at www.hud.gov/progdesc/home1a.html
8. HUD regulations governing the CDBG program are available on line at www.hud.gov/cpd/cdbg/cdbgreg.html
9. The HUD regulations that govern the Emergency Shelter Grant program are located at 24 CFR Section 576.
10. The HUD regulations governing the HOPWA program are included in 24 CFR Section 574.
11. The HUD web site provides executive summaries of ways HOPWA grantees have used this funding. These summaries can be found on the internet at www.hud.gov/cpd/hopwa/statesum.html
12. A copy of the complete HUD regulations governing the Consolidated Plan are available at 24 CFR Section 91.
13. 24 CFR Section 91.110.
14. 24 CFR Section 91.105(a)(2)(i).
15. People with disabilities living on SSI benefits often cannot afford even modestly priced rental housing unless they spend more than 50 percent of their income for rent and utilities-considered a "severe" rent burden by HUD.

CITATIONS

16. Annually, HUD establishes the Fair Market Rent for every market area by reviewing the price of rents for efficiencies (i.e., studios), one bedrooms, two bedrooms, etc. in that county or metropolitan *area*. An apartment at the Fair Market Rent is meant to be modest, not luxurious, costing less than the typical apartment of that bedroom size in that city or county.
17. 24 CFR Section 91.215(a)(l).
18. 24 CFR Section 91.215(a)(2).
19. 24 CFR Section 91.325(1).
20. Fair Housing Planning Guide. US Department of Housing and Urban Development. Vol. 2.
21. Fair Housing Planning Guide. US Department of Housing and Urban Development. Vol. 2.
22. The HUD regulations that govern the McKinney Supportive Housing Program *are* located at 24 CFR Section 583.
23. The HUD regulations that govern the McKinney Shelter Plus Care Program *are* located at 24 CFR Section 582.
24. The HUD regulations that govern the McKinney Section 8 SRO program *are* located at 24 CFR Section 882.
25. For more information see the PHA Plan Interim Rule published on page 8169 of the Federal Register on February 18, 1999.
26. PHA Plan Interim Rule. Federal Register: 18 February 1999. p. 8178.
27. 24 CFR Section 91.105(g).
28. A complete copy of the HUD Secretary's memo is included as Appendix 3.
29. Available on line at www.c-c-d.org/priced_out_in_1998.htm
30. Assisted Housing: Occupancy Restrictions on Persons with Disabilities. United States General Accounting Office. 1998.
31. Opening Doors: Recommendations for a Federal Policy to Address the Housing Needs of People with Disabilities. TAC and CCD. Boston: 1999.
32. 24 CFR Section 91.210(b)(2).
33. Available at www.hud.gov/pih/systems/mtcs/pihmtcs.html
34. Excerpted from HUD's Consolidated Plan: An Action Guide for Involving Low Income Communities. Gramlich, Ed. Center for Community Change. Washington DC: 1998.

APPENDICES

Appendix 1 Fiscal Year 1999 ConPlan Allocations

Appendix 2 Sample Citizen Participation Plan

Appendix 3 Secretary Cuomo's Letter to HUD Field Offices

Appendix 4 Sample Needs Statement

APPENDIX 1:

FISCAL YEAR 1999 CONPLAN ALLOCATIONS

All numbers in thousands

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL	LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Alabama						Antioch	707	0	0	0	707
Anniston	793	0	0	0	793	Apple Valley	572	0	0	0	572
Bessemer	937	0	0	0	937	Bakersfield	2790	1189	0	99	4078
Birmingham	8226	2287	365	292	11170	Baldwin Park	1821	428	0	0	2249
Decatur	551	0	0	0	551	Bellflower	1040	457	0	0	1497
Dothan	764	0	0	0	764	Berkeley	3911	1077	0	139	5127
Florence	501	0	0	0	501	Buena Park	1032	0	0	0	1032
Gadsden	1380	0	0	0	1380	Burbank	1341	671	0	0	2012
Hoover	253	0	0	0	253	Camarillo	447	0	0	0	447
Huntsville	1768	720	0	0	2488	Carlsbad	609	0	0	0	609
Mobile	3382	1530	0	120	5032	Corson	1392	0	0	0	1392
Montgomery	2868	1168	0	102	4138	Cerritos	550	0	0	0	550
Tuscaloosa	1400	709	0	0	2109	Chico	891	530	0	0	1421
Jefferson County	2745	1018	0	97	3860	China	704	0	0	0	704
AL State Program	33435	15178	796	1479	50888	Chula Vista	2020	843	0	0	2863
Subtotal	59003	22610	1161	2090	84864	Compton	2883	881	0	102	3866
Alaska						Concord	1106	0	0	0	1106
Anchorage	2268	965	0	80	3313	Corona	1108	0	0	0	1108
AK State Program	3167	3000	0	112	6279	Costa Mesa	1381	603	0	0	1984
Subtotal	5435	3965	0	192	9592	Daly	1604	0	0	0	1604
Arizona						Davis	918	583	0	0	1501
Chandler	1224	0	0	0	1224	Downey	1321	475	0	0	1796
Flagstaff	732	0	0	0	732	El Cajon	1353	693	0	0	2046
Gilbert	371	0	0	0	371	El Monte	3429	1035	0	122	4586
Glendale	1995	0	0	0	1995	Encinitas	585	0	0	0	585
Mesa	3432	0	0	122	3554	Escondido	1660	670	0	0	2330
Peoria City	572	0	0	0	572	Fairfield	816	0	0	0	816
Phoenix	15306	5138	923	543	21910	Fantana	1430	432	0	0	1862
Scottsdale	1090	0	0	0	1090	Fountain Valley	435	0	0	0	435
Tempe	1905	0	0	0	1905	Fremont	1655	0	0	0	1655
Tucson	7559	3683	0	268	11510	Fresno	8274	3514	0	293	12081
Yuma	976	0	0	0	976	Fullerton	1701	589	0	0	2290
Maricopa County	3454	4328	0	123	7905	Gardena	964	0	0	0	964
Pima County	2904	0	0	106	3010	Garden Grove	2595	782	0	92	3469
AZ State Program	10577	6101	366	686	17730	Gilroy City	542	0	0	0	542
Subtotal	52097	19250	1289	1848	74484	Glendale	4002	1739	0	142	5883
Arkansas						Glendora City	435	0	0	0	435
Conway	348	0	0	0	348	Hawthorne	1608	667	0	0	2275
Fayetteville	631	0	0	0	631	Hayward	1744	0	0	0	1744
Fort Smith	921	416	0	0	1337	Hemet	587	0	0	0	587
Jacksonville	327	0	0	0	327	Hesperia	735	0	0	0	735
Jonesboro	614	0	0	0	614	Huntington Beach	1682	683	0	0	2365
Little Rock	2242	985	0	80	3307	Huntington Park	2157	740	0	77	2974
North Little Rock	871	388	0	0	1259	Inglewood	2750	1021	0	98	3869
Pine Bluff	1163	478	0	0	1641	Irvine	1084	0	0	0	1084
Rogers	266	0	0	0	266	Laguna Niguel	308	0	0	0	308
Springdale	322	0	0	0	322	La Habra	718	0	0	0	718
Texarkana	420	0	0	0	420	Lake Forest	409	0	0	0	409
West Memphis	525	0	0	0	525	Lakewood	724	0	0	0	724
AR State Program	23620	11320	552	1062	36554	La Mesa	590	0	0	0	590
Subtotal	32270	13587	552	1142	47551	Lancaster	1200	0	0	0	1200
California						Livermore	476	0	0	0	476
Alameda	1338	0	0	0	1338	Lompoc	631	0	0	0	631
Alhambra	1889	724	0	0	2613	Long Beach	9339	4208	0	331	13878
Anaheim	4666	1559	0	166	6391	Los Angeles	89999	35887	8769	3190	137845
						Lynwood	1999	629	0	0	2628
						Madera	807	0	0	0	807
						Merced	1422	611	0	0	2033
						Milpitas City	682	0	0	0	682

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL	LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Mission Viejo	492	0	0	0	492	Thousand Oaks	802	0	0	0	802
Modesto	2481	1050	0	88	3619	Torrance	1338	579	0	0	1917
Montebello	1326	503	0	0	1829	Tulare	711	0	0	0	711
Monterey	274	0	0	0	274	Turlock	691	0	0	0	691
Monterey Park	1473	467	0	0	1940	Tustin	712	0	0	0	712
Moreno Valley	1487	413	0	0	1900	Union City	753	0	0	0	753
Mountain View	866	427	0	0	1293	Upland	711	0	0	0	711
Napa City	675	0	0	0	675	Vacaville	638	0	0	0	638
National City	1405	632	0	0	2037	Vallejo	1388	567	0	0	1955
Newport Beach	495	0	0	0	495	San Buenaventura	977	0	0	0	977
Norwalk	1749	417	0	0	2166	Victorville	770	0	0	0	770
Oakland	10223	4427	1670	363	16683	Visalia	1345	549	0	0	1894
Oceanside	1873	699	0	0	2572	Vista	1141	0	0	0	1141
Ontario	2490	770	0	88	3348	Walnut Creek	391	0	0	0	391
Orange	1410	474	0	0	1884	Watsonville	762	0	0	0	762
Oxnard	3028	876	0	107	4011	West Covina	1361	0	0	0	1361
Palmdale	978	0	0	0	978	Westminster	1343	408	0	0	1751
Palm Springs	625	0	0	0	625	Whittier	1014	427	0	0	1441
Palo Alto	738	0	0	0	738	Woodland	556	0	0	0	556
Paradise	280	0	0	0	280	Yorba Linda	316	0	0	0	316
Paramount City	1333	420	0	0	1753	Yuba	514	0	0	0	514
Pasadena	2514	1152	0	89	3755	Alameda County	2050	3434	0	0	5484
Petaluma	328	0	0	0	328	Contra Costa County	3868	2643	0	137	6648
Pico Rivera	1232	0	0	0	1232	Fresno County	5821	1890	0	206	7917
Pittsburg	712	0	0	0	712	Kern County	7230	2351	0	256	9837
Pleasanton City	294	0	0	0	294	Los Angeles County	37598	11956	0	1334	50888
Pomona	3209	947	0	114	4270	Marin County	1779	1020	0	0	2799
Porterville	731	0	0	0	731	Orange County	4827	1601	0	171	6599
Rancho Cucamonga	959	0	0	0	959	Riverside County	9995	2784	0	355	13134
Redding	925	550	0	0	1475	Sacramento County	7750	3324	0	275	11349
Redlands	683	0	0	0	683	San Bernardino County	7965	4035	0	283	12283
Redondo Beach	552	0	0	0	552	San Diego County	6452	3568	0	229	10249
Redwood City	944	399	0	0	1343	San Joaquin County	3818	1412	0	135	5365
Rialto	1134	0	0	0	1134	San Luis Obispo County	2562	1081	0	91	3734
Richmond	1553	743	0	0	2296	San Mateo County	3657	2027	0	130	5814
Riverside	3531	1337	1372	125	6365	Santa Clara County	2591	936	0	92	3619
Rosemead	1517	503	0	0	2020	Sonoma County	2478	1028	0	88	3594
Roseville	453	0	0	0	453	Ventura County	2435	1239	0	86	3760
Sacramento	6497	3135	656	230	10518	Cnsrt-Santa Barbara Co	0	1450	0	0	1450
Salinas	2455	898	0	87	3440	CA State Program	42906	43381	2427	5714	94428
San Bernardino	3884	1773	0	138	5795	Subtotal	519103	208240	27364	18404	773111
San Diego	18198	7781	2168	646	28793	Colorado					
San Francisco	25123	7077	8510	891	41601	Arvada	680	0	0	0	680
San Jose	12559	3881	649	445	17534	Aurora	2070	845	0	0	2915
San Leandro	802	0	0	0	802	Boulder	1173	614	0	0	1787
San Mateo	972	474	0	0	1446	Boulder Springs	3171	1380	0	112	4663
Santa Ana	8209	1968	1143	291	11611	Denver	11576	3695	1164	410	16845
Santa Barbara	1431	742	0	0	2173	Fort Collins	1169	614	0	0	1783
Santa Clara	1167	480	0	0	1647	Grand Junction	472	0	0	0	472
Santa Clarita	929	0	0	0	929	Greeley	936	427	0	0	1363
Santa Cruz	749	400	0	0	1149	Lakewood	1080	468	0	0	1548
Santa Maria	1300	0	0	0	1300	Longmont	486	0	0	0	486
Santa Monica	1568	742	0	0	2310	Loveland	339	0	0	0	339
Santa Rosa	1191	662	0	0	1853	Pueblo	2040	992	0	0	3032
Santee	461	0	0	0	461	Westminster	666	0	0	0	666
Seaside	567	0	0	0	567	Adams County	1983	687	0	0	2670
Simi Valley	809	0	0	0	809	Arapahoe County	1422	551	0	0	1973
South Gate	2635	865	0	93	3593	Jefferson County	1277	447	0	0	1724
South San Francisco	737	0	0	0	737	CO State Program	10892	6962	0	943	18797
Stockton	4957	1991	0	176	7124	Subtotal	41432	17682	1164	1465	61743
Sunnyvale	1347	555	0	0	1902						

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CSBG	HOME	HOPWA	ESG	TOTAL	LOCATION	CSBG	HOME	HOPWA	ESG	TOTAL
Connecticut						Miami Beach	2773	1470	0	98	4341
Bridgeport	4221	1649	0	150	6020	Naples	146	0	0	0	146
Bristol	645	0	0	0	645	North Miami	1073	0	0	0	1073
Danbury	661	0	0	0	661	Ocala	717	0	0	0	717
East Hartford	639	0	0	0	639	Orlando	2421	1119	1753	86	5379
Fairfield	646	0	0	0	646	Palm Bay	625	0	0	0	625
Greenwich	1135	0	0	0	1135	Panama City	540	0	0	0	540
Hamden Town	517	0	0	0	517	Pembroke Pines	615	0	0	0	615
Hartford	4905	2248	1413	174	8740	Pensacola	1084	0	0	0	1084
Manchester	695	0	0	0	695	Plantation	474	0	0	0	474
Meriden	1062	0	0	0	1062	Pompano Beach	1232	397	0	0	1629
Middletown	510	0	0	0	510	Port St Lucie	469	0	0	0	469
Milford Town	627	0	0	0	627	Punta Gorda	99	0	0	0	99
New Britain	2237	675	0	79	2991	St Petersburg	2977	1379	0	106	4462
New Haven	4847	1709	1214	172	7942	Sarasota	650	800	0	0	1450
New London	1162	0	0	0	1162	Sunrise	601	0	0	0	601
Norwalk	1143	0	0	0	1143	Tallahassee	2128	880	0	75	3083
Norwich	1218	0	0	0	1218	Tampa	4901	2088	1661	174	8824
Stamford	1218	454	0	0	1672	Titusville	426	0	0	0	426
Stratford	736	0	0	0	736	West Palm Beach	1161	509	2635	0	4305
Waterbury	2715	908	0	96	3719	Winterhaven	318	0	0	0	318
West Hartford	1322	0	0	0	1322	Brevard County	1771	1342	0	0	3113
West Haven	800	0	0	0	800	Broward County	6269	1915	0	222	8406
CT State Program	14186	10007	920	1023	26136	Dade County	22389	5862	0	794	29045
Subtotal	47847	17650	3547	1694	70738	Escambia County	2760	1705	0	98	4563
Delaware						Hillsborough County	6295	1856	0	223	8374
Dover	298	0	0	0	298	Lee County	2073	562	0	0	2635
Wilmington	3012	643	485	109	4249	Orange County	5628	1824	0	200	7652
New Castle County	2615	939	0	93	3647	Palm Beach County	6641	2011	0	236	8888
DE State Program	1914	3000	113	79	5106	Pasco County	3027	906	0	107	4040
Subtotal	7839	4582	598	281	13300	Pinellas County	3438	1466	0	120	5024
District Of Columbia						Polk County	4000	1179	0	142	5321
Washington	23317	6924	6475	827	37543	Sarasota County	1606	0	0	0	1606
Subtotal	23317	6924	6475	827	37543	Seminole County	2636	0	0	93	2729
Florida						Volusia County	3104	1956	0	110	5170
Boca Raton	469	0	0	0	469	FL State Program	33409	20461	3164	2265	59299
Boynton Beach	550	0	0	0	550	Subtotal	174610	65247	22800	6189	268846
Bradenton	556	0	0	0	556	Georgia					
Cape Coral	585	0	0	0	585	Albany	1699	731	0	0	2430
Clearwater	1005	463	0	0	1468	Athens-Clarke	1616	686	0	0	2302
Cocoa	324	0	0	0	324	Atlanta	12205	3925	3407	433	19970
Coral Springs	705	0	0	0	705	Augusta	2836	1310	0	101	4247
Davie	501	0	0	0	501	Columbus-Muscogee	2749	1320	0	97	4166
Daytona Beach	1080	589	0	0	1669	Macon	2000	1021	0	0	3021
Delray Beach	624	0	0	0	624	Marietta	573	0	0	0	573
Ft Lauderdale	2687	1008	4186	95	7976	Roswell	291	0	0	0	291
Ft Myers	858	0	0	0	858	Savannah	3289	1341	0	117	4747
Fort Pierce	903	0	0	0	903	Warner Robins	515	0	0	0	515
Fort Walton Beach	220	0	0	0	220	Clayton County	1759	0	0	0	1759
Gainesville	1584	698	0	0	2282	Cobb County	2928	3736	0	104	6768
Hialeah	5408	1641	0	192	7241	DeKalb County	4996	1968	0	177	7141
Hollywood	1617	592	0	0	2209	Fulton County	2599	0	0	92	2691
Jacksonville-Duval	8500	3263	983	301	13047	Gwinnett County	2672	0	0	95	2767
Lakeland	894	425	0	0	1319	GA State Program	43103	18759	1297	1821	64980
Largo	527	0	0	0	527	Subtotal	85830	34797	4704	3037	128368
Lauderhill	674	0	0	0	674	Hawaii					
Margate	415	0	0	0	415	Honolulu	13093	4246	364	464	18167
Melbourne	717	0	0	0	717	HI State Program	4887	3000	132	173	8192
Miami	12731	4881	8418	452	26482	Subtotal	17980	7246	496	637	26359

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Idaho					
Boise	1272	611	0	0	1883
Nampa	484	0	0	0	484
Pocatello	610	0	0	0	610
ID State Program	9353	4486	0	414	14253
Subtotal	11719	5097	0	414	17230

Illinois					
Arlington Heights	380	0	0	0	380
Aurora	1329	0	0	0	1329
Belleville	849	0	0	0	849
Berwyn	1738	0	0	0	1738
Bloomington	808	0	0	0	808
Champaign	951	0	0	0	951
Chicago	110103	33537	4219	3903	151762
Chicago Heights	749	0	0	0	749
Cicero	1951	0	0	0	1951
Decatur	1838	663	0	0	2501
De Kalb	526	0	0	0	526
Des Plaines	314	0	0	0	314
Downers Grove	282	0	0	0	282
East St Louis	2401	640	0	85	3126
Elgin	991	0	0	0	991
Evanston	2363	451	0	84	2898
Joliet	1149	464	0	0	1613
Kankakee	758	0	0	0	758
Moline	1003	0	0	0	1003
Mount Prospect	362	0	0	0	362
Naperville	430	0	0	0	430
Normal	513	0	0	0	513
North Chicago	372	0	0	0	372
Oak Lawn	328	0	0	0	328
Oak Park	2265	0	0	80	2345
Pekin	527	0	0	0	527
Peoria	2406	1049	0	85	3540
Rantoul	425	0	0	0	425
Rockford	2618	997	0	93	3708
Rock Island	1577	0	0	0	1577
Schaumburg Village	388	0	0	0	388
Skokie	634	0	0	0	634
Springfield	1578	689	0	0	2267
Urbana	528	931	0	0	1459
Waukegan	908	0	0	0	908
Wheaton City	338	0	0	0	338
Cook County	12544	5743	0	445	18732
DuPage County	3635	2044	0	133	5812
Kane County	1134	0	0	0	1134
Lake County	2784	1349	0	99	4232
McHenry County	1226	372	0	0	1598
Madison County	3748	1318	0	133	5199
St Clair County	2160	1078	0	77	3315
Will County	1866	491	0	0	2357
IL State Program	37664	22581	534	2347	63126
Subtotal	213441	74397	4753	7564	300155

Indiana					
Anderson	1145	518	0	0	1663
Bloomington	1074	620	0	0	1694
East Chicago	1806	448	0	0	2254
Elkhart	925	0	0	0	925
Evansville	3641	896	0	129	4666
Fort Wayne	3251	929	0	115	4295
Gary	4688	1305	0	166	6159

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Goshen	328	0	0	0	328
Hammond	2863	643	0	102	3608
Indianapolis	11478	4530	579	407	16994
Kokomo	1201	0	0	0	1201
Lafayette	940	663	0	0	1603
Mishawaka	589	0	0	0	589
Muncie	1742	609	0	0	2351
New Albany	857	0	0	0	857
South Bend	3571	1010	0	127	4708
Terre Haute	2414	464	0	86	2964
West Lafayette	505	0	0	0	505
Lake County	1672	599	0	0	2271
Cnsrt-Elkhart County	0	461	0	0	461
IA State Program	36368	13852	636	1739	52595
Subtotal	81058	27547	1215	2871	112691

Iowa					
Cedar Falls	393	0	0	0	393
Cedar Rapids	1545	563	0	0	2108
Council Bluffs	1286	0	0	0	1286
Davenport	2120	729	0	75	2924
Des Moines	5078	1281	0	180	6539
Dubuque	1419	0	0	0	1419
Iowa City	943	643	0	0	1586
Sioux City	2353	636	0	83	3072
Waterloo	1760	736	0	0	2496
IA State Program	29939	10094	0	1318	41351
Subtotal	46836	14682	0	1656	63174

Kansas					
Kansas City	3224	1041	0	114	4379
Lawrence	1074	549	0	0	1623
Leavenworth	452	0	0	0	452
Overland Park	634	0	0	0	634
Topeka	2449	668	0	87	3204
Wichita	3759	1860	0	133	5752
Johnson County	1545	777	0	0	2322
KS State Program	20268	7428	0	848	28544
Subtotal	33405	12323	0	1182	46910

Kentucky					
Ashland	839	0	0	0	839
Covington	2182	556	0	77	2815
Henderson	349	0	0	0	349
Hopkinsville	491	0	0	0	491
Lexington-Fayette	2670	1351	0	95	4116
Louisville	11893	2913	0	422	15228
Owensboro	770	406	0	0	1176
Jefferson County	3189	1159	0	113	4461
KY State Program	33764	16630	561	1279	52234
Subtotal	56147	23015	561	1986	81709

Louisiana					
Alexandria	1033	437	0	0	1470
Baton Rouge	5827	2189	0	207	8223
Bossier City	736	0	0	0	736
Hauma-Terrebonne	1973	547	0	0	2520
Kenner	999	0	0	0	999
Lafayette	2459	845	0	87	3391
Lake Charles	1281	527	0	0	1808
Monroe	1457	552	0	0	2009
New Orleans	19703	7154	2031	699	29587
Shreveport	3833	1491	0	136	5460

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Slidell	235	0	0	0	235
Thibodaux	328	0	0	0	328
Jefferson Parish	5021	2334C	0	178	7533
LA State Program	36643	14719	1063	1580	54005
Subtotal	81528	30795	3094	2887	118304

Maine

Auburn	749	0	0	0	749
Bangor	1252	0	0	0	1252
Lewiston	1266	0	0	0	1266
Portland	2487	610	0	88	3185
ME State Program	16310	5961	0	692	22963
Subtotal	22064	6571	0	780	29415

Maryland

Annapolis	415	0	0	0	415
Baltimore	29331	8156	4689	1040	43216
Cumberland	1269	0	0	0	1269
Frederick	431	0	0	0	431
Hagerstown	1112	0	0	0	1112
Anne Arundel County	2471	776	0	88	3335
Baltimore County	4850	2117	0	172	7139
Harford County	1304	487	0	0	1791
Howard County	1154	0	0	0	1154
Montgomery County	5844	2098	0	207	8149
Prince Georges County	6708	2399	0	238	9345
MD State Program	9009	6772	0	519	16300
Subtotal	63898	22805	4689	2264	93656

Massachusetts

Arlington	1466	0	0	0	1466
Attleboro	566	0	0	0	566
Barnstable	402	0	0	0	402
Boston	24887	6776	1890	883	34436
Brockton	1749	843	0	0	2592
Brookline	1855	0	0	0	1855
Cambridge	3893	792	0	138	4823
Chicopee	1470	0	0	0	1470
Fall River	3538	1084	0	126	4748
Fitchburg	1367	571	0	0	1938
Framingham	626	0	0	0	626
Gloucester	876	0	0	0	876
Haverhill	1290	0	0	0	1290
Holyoke	1674	1055	0	0	2729
Lawrence	2306	1240	0	82	3628
Leominster	535	0	0	0	535
Lowell	2810	1131	0	100	4041
Lynn	3283	918	0	116	4317
Malden	1787	2154	0	0	3941
Medford	2107	0	0	75	2182
New Bedford	3608	1241	0	128	4977
Newton	2643	1049	0	94	3786
Northampton	877	0	0	0	877
Pittsfield	1814	0	0	0	1814
Quincy	2442	692	0	87	3221
Salem	1392	0	0	0	1392
Somerville	3609	753	0	128	4490
Springfield	5063	1878	0	180	7121
Taunton	1003	0	0	0	1003
Waltham	1227	0	0	0	1227
Westfield	508	0	0	0	508
Weymouth	822	0	0	0	822

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Worcester	5754	1596	0	204	7554
Yarmouth	202	0	0	0	202
Cnsrt-Barnstable County	0	706	0	0	706
Cnsrt-Peabody	0	1978	0	0	1978
MA State Program	37621	13812	1111	2161	54705
Subtotal	127072	40269	3001	4502	174844

Michigan

Ann Arbor	1381	699	0	0	2080
Battle Creek	1689	470	0	0	2159
Bay City	1849	398	0	0	2247
Benton Harbor	675	0	0	0	675
Canton Twp	426	0	0	0	426
Clinton Twp	637	0	0	0	637
Dearborn	2499	0	0	89	2588
Dearborn Heights	1193	0	0	0	1193
Detroit	51284	16612	1526	1819	71241
East Lansing	871	0	0	0	871
Farmington Hills	420	0	0	0	420
Flint	5569	1933	0	198	7700
Grand Rapids	4734	1671	0	168	6573
Holland	422	0	0	0	422
Jackson	1852	477	0	0	2329
Kalamazoo	2290	912	0	81	3283
Lansing	2413	1209	0	87	3709
Lincoln Park	936	0	0	0	936
Livonia	524	0	0	0	524
Midland	333	0	0	0	333
Muskegon	1342	514	0	0	1856
Muskegon Heights	573	0	0	0	573
Norton Shores	172	0	0	0	172
Pontiac	2053	845	0	0	2898
Portage	260	0	0	0	260
Port Huron	1111	438	0	0	1549
Redford	1025	0	0	0	1025
Rochester Hills	328	0	0	0	328
Roseville	546	0	0	0	546
Royal Oak	1525	0	0	0	1525
Saginaw	3290	1105	0	117	4512
St Clair Shores	1063	0	0	0	1063
Southfield	590	0	0	0	590
Sterling Heights	706	0	0	0	706
Taylor	792	0	0	0	792
Troy City	409	0	0	0	409
Warren	1138	437	0	0	1575
Waterford Township	481	0	0	0	481
Westland	1086	407	0	0	1493
Wyoming	546	0	0	0	546
Genesee County	2754	1132	0	98	3984
Kent County	1671	0	0	0	1671
Macomb County	1943	612	0	0	2555
Oakland County	4035	1329	0	143	5507
Wayne County	3667	1590	0	130	5387
MI State Program	43927	26844	677	2706	74154
Subtotal	159030	59634	2203	5636	226503

Minnesota

Bloomington	514	0	0	0	514
Duluth	3516	740	0	125	4381
Minneapolis	16937	3677	670	601	21885
Moorhead	454	0	0	0	454
Plymouth	311	0	0	0	311

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CD86	HOME	HOPWA	ESG	TOTAL	LOCATION	CD86	HOME	HOPWA	ESG	TOTAL
Rochester	604	0	0	0	604	Nashua	849	0	0	0	849
St Cloud	675	0	0	0	675	Portsmouth	708	0	0	0	708
St Paul	9995	2321	0	354	12670	Rochester	367	0	0	0	367
Anoka County	1841	0	0	0	1841	NH State Program	9903	4008	0	433	14344
Dakota County	2001	2103	0	0	4104	Subtotal	14447	4644	0	511	19602
Hennepin County	3482	1723	0	124	5329	New Jersey					
Ramsey County	1431	0	0	0	1431	Asbury Park	505	0	0	0	505
St Louis County	3085	693	0	110	3888	Atlantic City	1941	506	0	0	2447
MIN State Program	24986	9146	92	1160	35384	Bayonne	2245	0	0	80	2325
Subtotal	69832	20403	762	2474	93471	Bloomfield	1511	0	0	0	1511
Mississippi						Brick Township	411	0	0	0	411
Biloxi	753	0	0	0	753	Bridgeton	622	0	0	0	622
Gulfport	1010	0	0	0	1010	Camden	3720	1424	0	132	5276
Hattiesburg	1038	455	0	0	1493	Cherry Hill	434	0	0	0	434
Jackson	3624	1429	0	129	5182	Clifton	1863	0	0	0	1863
Mass Point	333	0	0	0	333	Dover Township	511	0	595	0	1106
Pascagoula	430	0	0	0	430	East Orange	2036	915	0	0	2951
MI State Program	37247	14337	769	1443	53796	Edison	624	0	0	0	624
Subtotal	44435	16221	769	1572	62997	Elizabeth	2824	1303	0	100	4227
Missouri						Gloucester Twp	329	0	0	0	329
Columbia	1038	536	0	0	1574	Hamilton	641	0	0	0	641
Florissant	287	0	0	0	287	Irvington	1338	567	0	0	1905
Independence	1049	488	0	0	1537	Jersey City	8683	2855	2271	308	14117
Joplin	951	0	0	0	951	Long Branch	678	0	0	0	678
Kansas City	11394	2824	813	404	15435	Middletown	356	0	0	0	356
Lees Summit	348	0	0	0	348	Millville	383	0	0	0	383
St Charles	410	0	0	0	410	Newark	11596	3965	5777	411	21749
St Joseph	2351	524	0	83	2958	New Brunswick	961	409	0	0	1370
St Louis	27671	5038	944	982	34635	North Bergen Township	1026	0	0	0	1026
Springfield	1870	990	0	0	2860	Old Bridge Township	363	0	0	0	363
St Louis County	6497	2511	0	230	9238	Parsippany-Troyhills	279	0	0	0	279
MO State Program	28697	14693	396	1225	45011	Passaic	1450	811	0	0	2261
Subtotal	82563	27604	2153	2924	115244	Paterson	3296	1642	1160	117	6215
Montana						Perth Amboy	917	448	0	0	1365
Billings	896	451	0	0	1347	Sayreville	197	0	0	0	197
Great Falls	1028	420	0	0	1448	Trenton	3834	880	0	136	4850
Missoula	684	0	0	0	684	Union City	1630	0	0	0	1630
MT State Program	7767	4037	0	363	12167	Union	837	0	0	0	837
Subtotal	10375	4908	0	363	15646	Vineland	655	730	0	0	1385
Nebraska						Wayne Township	232	0	0	0	232
Lincoln	2164	1057	0	77	3298	Woodbridge	686	0	671	0	1357
Omaha	6394	2462	0	227	9083	Bergen County	12532	2596	0	444	15572
NE State Program	14835	4661	0	524	20020	Burlington County	2037	726	0	0	2763
Subtotal	23393	8180	0	828	32401	Camden County	2828	1129	0	100	4057
Nevada						Essex County	7396	1168	0	262	8826
Henderson	811	0	0	0	811	Gloucester County	1823	706	0	0	2529
Las Vegas	3999	0	1308	142	5449	Hudson County	5024	3097	0	178	8299
North Las Vegas	1205	0	0	0	1205	Middlesex County	2000	1391	0	0	3391
Reno	1910	1242	0	0	3152	Monmouth County	3697	1064	0	131	4892
Sparks	557	0	0	0	557	Morris County	2591	778	0	92	3461
Clark County	4549	3684	0	161	8394	Ocean County	2356	1170	0	84	3610
Cnsrt-Lyon County	0	468	0	0	468	Somerset County	1540	491	0	0	2031
NE State Program	2842	3000	190	260	6292	Union County	6252	1279	0	222	7753
Subtotal	15873	8394	1498	563	26328	Cnsrt-Mercer County	0	531	0	0	531
New Hampshire						Cnsrt-Atlantic County	0	555	0	0	555
Dover	435	0	0	0	435	NJ State Program	10924	7581	1430	1480	21415
Manchester	2185	636	0	78	2899	Subtotal	120614	40717	11904	4277	177512
New Mexico						Albuquerque	5343	2155	0	190	7688
						Las Cruces	1200	470	0	0	1670

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CD86	HOME	HOPWA	ESG	TOTAL	LOCATION	CD86	HOME	HOPWA	ESG	TOTAL
Santa Fe	735	0	0	0	735	Fayetteville	1123	581	0	0	1704
NM State Program	15462	6171	391	615	22639	Gastonia	697	517	0	0	1214
Subtotal	22740	8796	391	805	32732	Goldsboro	596	339	0	0	935
New York						Greensboro	1965	1766	0	0	3731
Albany	4487	984	0	159	5630	Greenville	836	734	0	0	1570
Amherst Town	698	981	0	0	1679	Hickory	301	0	0	0	301
Auburn	1250	0	0	0	1250	High Point	809	0	0	0	809
Babylon Town	1538	592	0	0	2130	Jacksonville	537	0	0	0	537
Binghamton	2953	610	0	105	3668	Kannapolis	515	0	0	0	515
Buffalo	21171	5580	352	751	27854	Lenoir	201	873	0	0	1074
Cheektawaga Town	862	0	0	0	862	Morganton	139	0	0	0	139
Clay Town	352	0	0	0	352	Raleigh	2336	1074	386	83	3879
Colonie Town	455	0	0	0	455	Rocky Mount	760	792	0	0	1552
Dunkirk	689	0	0	0	689	Salisbury	413	0	0	0	413
Elmira	1695	475	0	0	2170	Wilmington	912	560	0	0	1472
Glens Falls	645	0	0	0	645	Winston Salem	1844	1152	0	0	2996
Greece	512	0	0	0	512	Cumberland County	2255	844	0	80	3179
Hamburg Town	481	0	0	0	481	Wake County	1699	452	0	0	2151
Huntington Town	1112	0	0	0	1112	Cnsrt-Surry County	0	530	0	0	530
Irondequoit	1042	0	0	0	1042	Cnsrt-Orange County	0	437	0	0	437
Islip Town	2324	724	1362	82	4492	NC State Program	45107	16105	1212	2227	64651
Jamestown	1654	435	0	0	2089	Subtotal	72101	31693	1995	2552	108341
Middletown	670	0	0	0	670	North Dakota					
Mount Vernon	2219	684	0	79	2982	Bismarck	454	0	0	0	454
Newburgh	1061	0	0	0	1061	Fargo	849	0	0	0	849
New Rochelle	1984	464	0	0	2448	Grand Forks	562	0	0	0	562
New York City	221885	104240	48668	7868	382661	ND State Program	6207	3629	0	285	10121
Niagara Falls	3314	773	0	118	4205	Subtotal	8072	3629	0	285	11986
Poughkeepsie	1322	0	0	0	1322	Ohio					
Rochester	11699	3535	542	415	16191	Akron	8461	2242	0	300	11003
Rome	1363	0	0	0	1363	Alliance	849	0	0	0	849
Saratoga Springs	448	0	0	0	448	Barberton	943	0	0	0	943
Schenectady	3173	1402	0	113	4688	Bowling Green	416	0	0	0	416
Syracuse	7568	2052	0	268	9888	Canton	3665	889	0	130	4684
Tonawanda Town	2040	0	0	0	2040	Cincinnati	16672	4796	395	591	22454
Troy	2479	0	0	88	2567	Cleveland	30433	8006	670	1079	40188
Union Town	1639	0	0	0	1639	Cleveland Heights	1908	0	0	0	1908
Utica	3916	961	0	139	5016	Columbus	8594	5022	458	305	14379
West Seneca	300	0	0	0	300	Dayton	8268	2334	0	293	10895
White Plains	1210	0	0	0	1210	East Cleveland	1299	562	0	0	1861
Yonkers	4403	1746	0	156	6305	Elyria	695	0	0	0	695
Dutchess County	1736	859	0	0	2595	Euclid	1201	0	0	0	1201
Erie County	3343	1166	0	119	4628	Fairborn	433	0	0	0	433
Monroe County	2026	1113	0	0	3139	Hamilton City	1831	591	0	0	2422
Nassau County	17536	2961	0	622	21119	Kent	435	0	0	0	435
Onondaga County	2222	730	0	79	3031	Kettering	492	0	0	0	492
Orange County	1970	1171	0	0	3141	Lakewood	2560	0	0	91	2651
Rockland County	2231	834	0	79	3144	Lancaster	665	0	0	0	665
Suffolk County	4185	1588	0	148	5921	Lima	1480	444	0	0	1924
Westchester County	6603	1496	0	234	8333	Lorain	1522	663	0	0	2185
Cnsrt-Jefferson County	0	1262	0	0	1262	Mansfield	1087	475	0	0	1562
NY State Program	54655	29162	2218	3022	89057	Marietta	538	0	0	0	538
Subtotal	413120	168580	53142	14644	649486	Massillon	923	0	0	0	923
North Carolina						Mentor	245	0	0	0	245
Asheville	1547	1140	0	0	2687	Middletown	787	0	0	0	787
Burlington	428	0	0	0	428	Newark	1019	0	0	0	1019
Chapel Hill	434	0	0	0	434	Parma	974	0	0	0	974
Charlotte	4556	2082	397	162	7197	Springfield	2507	747	0	89	3343
Concord	332	761C	0	0	1093	Staubenville	1005	0	0	0	1005
Durham	1759	954C	0	0	2713	Toledo	9544	3078	0	338	12960

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Warren	1609	986	0	0	2595
Youngstown	5548	1232	0	197	6977
Butler County	1475	0	0	0	1475
Cuyahoga County	3280	2497	0	115	5892
Franklin County	2196	783	0	78	3057
Hamilton County	3483	1456	0	124	5063
Lake County	1527	498	0	0	2025
Montgomery County	2512	1238	0	89	3839
Stark County	1668	1111	0	0	2779
Summit County	1675	608	0	0	2283
OH State Program	54624	29624	822	2934	88004
Subtotal	191048	69882	2345	6753	270028

Oklahoma

Broken Arrow	484	0	0	0	484
Edmond	452	0	0	0	452
Enid	715	0	0	0	715
Lawton	1132	511	0	0	1643
Midwest City	598	0	0	0	598
Norman	998	444	0	0	1442
Oklahoma City	6322	2598	0	224	9144
Shawnee	541	0	0	0	541
Tulsa	4729	2078	0	168	6975
Cnsrt-Tulsa County	0	1030	0	0	1030
OK State Program	20668	10956	723	903	33250
Subtotal	36639	17617	723	1295	56274

Oregon

Ashland	221	0	0	0	221
Beaverton	476	0	0	0	476
Eugene	1543	1451	0	0	2994
Gresham	666	0	0	0	666
Medford	631	0	0	0	631
Portland	12157	4276	803	431	17667
Salem	1403	849	0	0	2252
Springfield	680	0	0	0	680
Clackamas County	2448	869	0	87	3404
Multnomah County	378	0	0	0	378
Washington County	2355	1092	0	84	3531
OR State Program	15598	9766	0	764	26128
Subtotal	38556	18303	803	1366	59028

Pennsylvania

Abington	941	0	0	0	941
Allentown	3222	789	0	114	4125
Altoona	2544	499	0	90	3133
Bensalem Township	425	0	0	0	425
Bethlehem	1948	517	0	0	2465
Bristol Township	675	0	0	0	675
Carlisle	447	0	0	0	447
Chester	1914	461	0	0	2375
Easton	1160	0	0	0	1160
Erie	4431	1195	0	157	5783
Harrisburg	2809	724	0	100	3633
Haverford	1110	0	0	0	1110
Hazleton	1150	0	0	0	1150
Johnstown	2110	387	0	75	2572
Lancaster	2268	665	0	80	3013
Lebanon	1020	0	0	0	1020
Lower Merion	1396	0	0	0	1396
McKeesport	1619	0	0	0	1619
Millcreek Township	309	0	0	0	309
Norristown	1176	0	0	0	1176

Penn Hills	736	0	0	0	736
Philadelphia	68713	14601	3428	2437	89179
Pittsburgh	21309	3957	491	756	26513
Reading	3932	836	0	139	4907
Scranton	4134	699	0	147	4980
Sharon	813	0	0	0	813
State College	963	388	0	0	1351
Upper Darby	2400	0	0	85	2485
Wilkes-Barre	2357	398	0	84	2839
Williamsport	1655	428	0	0	2083
York	2064	519	0	0	2583
Allegheny County	18686	4365	0	663	23714
Beaver County	4669	1144	0	166	5979
Berks County	3131	526	0	111	3768
Bucks County	2641	1060	0	94	3795
Chester County	3206	912	0	114	4232
Delaware County	4586	1114	0	163	5863
Lancaster County	3814	1064	0	135	5013
Luzerne County	5979	1030	0	212	7221
Montgomery County	4100	1159	0	145	5404
Washington County	5322	1099	0	189	6610
Westmoreland County	4901	1762	0	174	6837
York County	2884	666	0	102	3652
PA State Program	57736	25569	1135	2803	87243
Subtotal	263405	68533	5054	9335	346327

Rhode Island

Cranston	1272	0	0	0	1272
East Providence	866	0	0	0	866
Pawtucket	2511	580	0	89	3180
Providence	7366	2098	424	261	10149
Warwick	915	0	0	0	915
Woonsocket	1545	495	0	55	2095
RI State Program	5625	4017	0	307	9949
Subtotal	20100	7190	424	712	28426

South Carolina

Aiken	265	0	0	0	265
Anderson	934	0	0	0	934
Charleston	1684	695	0	0	2379
Columbia	1483	741	0	0	2224
Florence	512	0	0	0	512
Greenville	1368	395	0	0	1763
Myrtle Beach	265	0	0	0	265
Rock Hill	599	0	0	0	599
Spartanburg	912	415	0	0	1327
Sumter	603	0	0	0	603
Charleston County	2835	1032	0	101	3968
Greenville County	2569	884	0	91	3544
Spartanburg County	1548	0	0	0	1548
Cnsrt-Sumter County	0	1033	0	0	1033
SC State Program	29192	11420	1657	1392	43661
Subtotal	44769	16615	1657	1584	64625

South Dakota

Rapid City	661	0	0	0	661
Sioux Falls	979	506	0	0	1485
SD State Program	8103	3320	0	344	11767
Subtotal	9743	3826	0	344	13913

Tennessee

Bristol	246	0	0	0	246
Chattanooga	2467	1216	0	88	3771

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL	LOCATION	CDBG	HOME	HOPWA	ESG	TOTAL
Clarksville	929	391	0	0	1320	San Benito	679	0	0	0	679
Jackson	753	377	0	0	1130	San Marcos	703	0	0	0	703
Johnson City	629	0	0	0	629	Sherman	421	0	0	0	421
Kingsport	516	0	0	0	516	Temple	756	0	0	0	756
Knoxville	2485	1365	0	88	3938	Texarkana	565	0	0	0	565
Memphis	11133	5065	538	395	17131	Texas City	633	0	0	0	633
Murfreesboro	581	0	0	0	581	Tyler	1277	561	0	0	1838
Nashville-Davidson	5872	2781	479	208	9340	Victoria	977	0	0	0	977
Oak Ridge	263	0	0	0	263	Waco	2204	967	0	78	3249
Knox County	1381	419	0	0	1800	Wichita Falls	1795	561	0	0	2356
Shelby County	1598	462	0	0	2060	Bexar County	2252	559	0	80	2891
TN State Program	29782	14589	525	1297	46193	Brazoria County	2010	516	0	0	2526
Subtotal	58635	26665	1542	2076	88918	Dallas County	1911	487	0	0	2398
Texas						Fort Bend County	2121	463	0	0	2584
Abilene	1442	534	0	0	1976	Harris County	11372	2891	0	403	14666
Amarillo	2407	926	0	85	3418	Hidalgo County	8763	1906	0	311	10980
Arlington	2860	1007	0	101	3968	Montgomery County	1763	0	0	0	1763
Austin	8105	3137	767	288	12297	Tarrant County	3529	1087	0	125	4741
Baytown City	1091	0	0	0	1091	TX State Program	84441	37060	2086	4721	128308
Beaumont	2317	836	0	82	3235	Subtotal	292803	99630	13284	10377	416094
Brownsville	4083	1153	0	145	5381	Utah					
Bryan	1054	400	0	0	1454	Clearfield	332	0	0	0	332
Carrollton	741	0	0	0	741	Layton	418	0	0	0	418
College Station	1186	535	0	0	1721	Ogden	1614	485	0	0	2099
Conroe	529	0	0	0	529	Orem	753	0	0	0	753
Corpus Christi	4929	1787	0	175	6891	Provo	2012	1532	0	0	3544
Dallas	19161	6965	2505	680	29311	Salt Lake City	4840	1209	0	172	6221
Denison	470	0	0	0	470	Sandy City	562	0	0	0	562
Denton	1066	520	0	0	1586	Taylorville	467	0	0	0	467
Edinburg	920	0	0	0	920	West Jordan	461	0	0	0	461
El Paso	12396	4252	0	440	17088	West Valley	1144	0	0	0	1144
Fort Worth	7677	2744	655	272	11348	Salt Lake County	3148	1704	0	112	4964
Galveston	1822	607	0	0	2429	UT State Program	7475	3000	368	540	11383
Garland	2003	595	0	0	2598	Subtotal	23226	7930	368	824	32348
Grand Prairie	1345	414	0	0	1759	Vermont					
Harlingen	1338	403	0	0	1741	Burlington	1037	0	0	0	1037
Houston	35018	11821	6466	1242	54547	VT State Program	8518	3635	0	338	12491
Irving	2238	797	0	79	3114	Subtotal	9555	3635	0	338	13528
Killeen	1037	397	0	0	1434	Virginia					
Laredo	4299	1354	0	153	5806	Alexandria	1213	602	0	0	1815
Lewisville	476	0	0	0	476	Bristol	337	0	0	0	337
Longview	1034	414	0	0	1448	Charlottesville	681	750	0	0	1431
Lubbock	3183	1163	0	113	4459	Chesapeake	1536	558	0	0	2094
McAllen	2569	689	0	91	3349	Colonial Heights	110	0	0	0	110
Marshall	529	0	0	0	529	Danville	1200	478	0	0	1678
Mesquite	1038	0	0	0	1038	Fredericksburg	245	0	0	0	245
Midland	1314	0	0	0	1314	Hampton	1382	686	0	0	2068
Mission	980	0	0	0	980	Hopewell	283	0	0	0	283
Missouri City	310	0	0	0	310	Lynchburg	951	419	0	0	1370
New Braunfels	438	0	0	0	438	Newport News	2147	1157	0	76	3380
North Richland Hills	366	0	0	0	366	Norfolk	6531	2074	0	232	8837
Odessa	1632	447	0	0	2079	Petersburg	742	0	0	0	742
Orange	548	0	0	0	548	Portsmouth	2193	928	0	78	3199
Posadena	2046	618	0	0	2664	Richmond	5950	1817	492	211	8470
Pharr	1318	0	0	0	1318	Roanoke	2108	677	0	75	2860
Plano	1019	0	0	0	1019	Suffolk	754	534	0	0	1288
Port Arthur	1851	509	0	0	2360	Virginia Beach	3063	1165	702	109	5039
Richardson	547	0	0	0	547	Arlington County	2303	983	0	82	3368
Round Rock	413	0	0	0	413	Chesterfield County	1381	404	0	0	1785
San Angelo	1386	482	0	0	1868	Fairfax County	6118	1868	0	217	8203
San Antonio	20100	7066	805	713	28684						

APPENDIX 1: FISCAL YEAR 1999 CONPLAN ALLOCATIONS

LOCATION	CD86	HOME	HOPWA	ESG	TOTAL	LOCATION	CD86	HOME	HOPWA	ESG	TOTAL
Henrico County	1520	645	0	0	2165	Oshkosh	1044	0	0	0	1044
Prince William County	1674	544	0	0	2218	Racine	2543	898	0	90	3531
VA State Program	23173	11812	463	1317	36765	Sheboygan	1201	0	0	0	1201
Subtotal	67595	28101	1657	2397	99750	Superior	1106	0	0	0	1106
Washington						Waukesha	491	0	0	0	491
Auburn	392	0	0	0	392	Wausau	840	0	0	0	840
Bellevue	698	0	0	0	698	Wauwatosa	1332	0	0	0	1332
Bellingham	891	417	0	0	1308	West Allis	1571	0	0	0	1571
Bremerton	580	0	0	0	580	Dane County	1114	0	0	0	1114
Everett	932	0	0	0	932	Milwaukee County	1740	1056	0	0	2796
Federal Way	575	0	0	0	575	Waukesha County	1127	793	0	0	1920
Kennewick	585	0	0	0	585	WI State Program	32713	14495	325	1824	49357
Olympia	412	0	0	0	412	Subtotal	78619	29401	718	2787	111525
Pasco	621	0	0	0	621	Wyoming					
Richland	289	645	0	0	934	Casper	512	0	0	0	512
Seattle	15029	3897	1401	533	20860	Cheyenne	589	0	0	0	589
Spokane	4512	1619	0	160	6291	WY State Program	3390	3500	0	159	7049
Tacoma	3344	1589	0	119	5052	Subtotal	4491	3500	0	159	8150
Vancouver	755	0	0	0	755	Puerto Rico					
Yakima	1015	547	0	0	1562	Aguadilla Municipio	2516	493	0	89	3098
Clark County	1837	1089	0	0	2926	Arecibo Municipio	3905	611	0	139	4655
King County	6490	3255	0	230	9975	Bayamon Municipio	6575	1452	0	233	8260
Kitsap County	1427	963	0	0	2390	Caguas Municipio	4780	889	0	170	5839
Pierce County	4359	1677	0	155	6191	Canovanas Municipio	1732	0	0	0	1732
Snohomish County	3371	1645	0	120	5136	Carolina Municipio	5283	1305	0	187	6775
Spokane County	1906	696	0	0	2602	Cayey Municipio	1940	0	0	0	1940
Cnsrt-Longview	0	468	0	0	468	Fajardo Municipio	1352	0	0	0	1352
WA State Program	15539	9554	487	1009	26589	Guaynabo Municipio	2707	570	0	96	3373
Subtotal	65559	28061	1888	2326	97834	Humacao Municipio	2178	0	0	77	2255
West Virginia						Manati Municipio	1657	0	0	0	1657
Charleston	2423	918	0	86	3427	Mayaguez Municipio	3915	1036	0	139	5090
Huntington	2689	1018	0	95	3802	Ponce Municipio	7926	1378	0	281	9585
Parkersburg	1322	427	0	0	1749	Rio Grande Municipio	1840	0	0	0	1840
Weirton	590	0	0	0	590	San Juan Municipio	14371	5624	5891	510	26396
Wheeling	1903	601	0	0	2504	Toa Alta Municipio	1792	0	0	0	1792
WV State Program	20777	8704	0	870	30351	Toa Baja Municipio	3096	404	0	110	3610
Subtotal	29704	11668	0	1051	42423	Trujillo Alto Municipio	2037	0	0	0	2037
Wisconsin						Vega Baja Municipio	2363	0	0	84	2447
Appleton	720	0	0	0	720	PR State Program	58762	13297	1841	2515	76415
Beloit	810	0	0	0	810	Subtotal	130727	27059	7732	4630	170148
Eau Claire	905	480	0	0	1385	Insular Areas					
Green Bay	1206	710	0	0	1916	American Samoa	1005	288	0	43	1336
Janesville	673	0	0	0	673	Guam	2870	1335	0	123	4328
Kenosha	1339	589	0	0	1928	Northern Marianas	931	368	0	40	1339
La Crosse	1282	449	0	0	1731	Virgin Islands	2194	1209	0	94	3497
Madison	2516	1479	0	89	4084	Subtotal	7000	3200	0	300	10500
Milwaukee	22092	8452	393	784	31721	*Total*	4232700	1553500	200475	150000	6136675
Neenah	254	0	0	0	254						

APPENDIX 2

SAMPLE CITIZEN PARTICIPATION PLAN

This sample is based on the current CDBG and CHAS laws and regulations for formula jurisdictions. It is also enriched by the experiences of low-income people over the last 23 years from cities large and small across the country.

Text in regular type face is rooted in the laws or regulations. Underlined text consists of suggestions that go beyond what is minimally required by law or regulation, but which can be very helpful in preventing problems and in fostering a genuine public participation and accountability.

INTRODUCTION

The City _____ is required by law to have a detailed Citizen Participation Plan which contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of CDBG, HOME, ESG and HOPWA money. This Citizen Participation Plan must be available to the public.

Encouraging Public Participation

The law requires that our Citizen Participation Plan both provide for and encourage public participation, emphasizing involvement by low and moderate income people—especially those living in low and moderate income neighborhoods. Also, the U.S. Department of Housing and Urban Development (HUD) expects _____ (City) _____ to take whatever actions are appropriate to encourage participation of minorities, people who do not speak English, and people with disabilities.

Copies of this Citizen Participation Plan, as well as summaries of basic information about CDBG, HOME, ESG, HOPWA, and the Consolidated Planning process are available in the languages of residents who comprise a significant portion of the low and moderate income population. Currently, _____ (City) _____ has materials in Spanish, Mandarin, and Vietnamese. Residents needing materials in other languages are encouraged to contact City staff.

The Role of Low Income People

The law declares that the primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing: decent housing, a suitable living environment, and growing economic opportunities—all principally for low and moderate income people.

Because the amount of federal CDBG, HOME, ESG, and HOPWA money _____ (City) _____ gets each year is mostly based upon the severity of both poverty and substandard housing conditions in _____ (City) _____, it is necessary that public participation genuinely involve low income residents who experience these conditions.

Genuine involvement by low income people must take place at all stages of the process, including:

- Identifying needs.
- Setting priorities among these needs, deciding how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs.
- Overseeing the way in which programs are carried out.

The Various Stages of the Consolidated Plan Process

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general, these stages or events include:

1. Identification of housing and community development **needs**.
 2. Preparation of a draft use of funds for the upcoming year, called the **proposed Annual Action Plan**. Sometimes there might also be the development of a proposed new Five-Year Strategic Plan.
 3. Formal approval by elected officials of a final Annual Action Plan or Five-Year Strategic Plan.
- of _____

On occasion during the year, it might be necessary to change the use of the money already budgeted in an Annual Action Plan, or to change the priorities established in the Five-Year Strategic Plan. In that case, a formal **Substantial Amendment** will be proposed, considered, and acted upon.

After a "program year" is complete, an **Annual Performance Report** must be drafted for public review and comment and then sent to HUD.

The Program Year

The "program year" chosen by ____ (City) ____ is Month x through Month y.

PUBLIC NOTICE

Items Covered by the Public Notice Requirement

There shall be advanced public notice once a federally required document is available, such as the Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed Substantial Amendment to the Action Plan or Consolidated Plan, and the Annual Performance Report.

In addition, there shall be advanced public notice of all public hearings and all public meetings such as Community Advisory Committee meetings or City Council Subcommittee meetings relating to the funds or planning process covered by this Citizen Participation Plan.

"Adequate" Public Notice

Adequate advance notice is "timely"; it is given with enough lead time for the public to take informed action. The amount of lead time can vary, depending on the event. Specific amounts of time are given for different events later in this Citizen Participation Plan. The content of notices will give residents a clear understanding of the event being announced.

Forms of Public Notice

1. a. Public notices will be published in the "Major Newspaper(s) of the City" as display advertisements in a non-legal section of the newspaper(s). [Editorial Note: Some jurisdictions might be required by local law to also place a formal notice in the legal section of the newspaper.] [Editorial Note: Technically, the regulations only require non-legal section notice for public hearings, but the spirit of "adequate notice" and "encouraging" public participation in the regulations suggests that "small print notices" buried in the legal pages of the newspaper would not be "adequate" for notices related to other (nonpublic hearing) parts of the Consolidated Plan process.]
- b. In addition, press releases will be sent to the newspaper(s).
2. Display ads and press releases will also be placed in:
"Neighborhood Newspaper X," "Neighborhood Newspaper Y," "The African-American Herald," "El Tiempo," and "The Asian Argus."
3. Public Service Announcements and press releases will be distributed to local radio and television stations.
4. Notice will also be given through letters to neighborhood organizations, public housing resident groups, religious organizations in lower income neighborhoods, and agencies providing services to lower income people.
5. Notice will be sent to any person or organization requesting to be on a mailing list.

PUBLIC ACCESS TO INFORMATION

As required by law, ____ (City) ____ will provide the public with reasonable and timely access to information and records relating to the data or content of the Consolidated Plan, as well as the proposed, actual, and past use of funds covered by this Citizen Participation Plan. Regarding the past use of funds, the law requires reasonable public access to records about any uses of these funds during the previous five years.

Also, as required by law, ____ (City) ____ will provide the public with reasonable and timely access to local meetings relating to the proposed or actual use of funds (such as Community Advisory Committee meetings, Planning Commission meetings, City Council subcommittee meetings, etc.).

Standard Documents

Standard documents include:

- The proposed and final Annual Action Plans.
- The proposed and final Five-Year Strategic Plan (the "Consolidated Plan").
- Proposed and final Substantial Amendments to either an Annual Action Plan or the Five-Year Strategic Plan.
- Annual Performance Reports.
- The Citizen Participation Plan.

Availability of Standard Documents

In the spirit of encouraging public participation, copies of standard documents will be provided to the public at no cost and within two working days of a request.

These materials will be available in a form accessible to persons with disabilities, when requested.

Places Where Standard Documents Are Available

Standard documents will be available at: the Central Library and the Library Branches in (names of low income neighborhoods) the offices of Neighborhood Organization x, Neighborhood Organization y, and Neighborhood Organization z; as well as the offices of the City Department that administers CDBG.

PUBLIC HEARINGS

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals. The law requires public hearings at all stages of the process, including at least a hearing about community needs, a public hearing to review proposed uses of funds, and a public hearing to assess how funds were spent during the previous program year. (More about these specific hearings is in the sections of this Citizen Participation Plan relating to each of the "stages.")

Access to Public Hearings

Public hearings will be held only after there has been **adequate notice** as described in the Public Notice part of this Citizen Participation Plan, including a display advertisement in the non-legal section of the newspaper 14 days prior to the public hearing.

Public hearings will be held at x:00, a **time** convenient to most people who might benefit from the use of funds. [Editorial Note. Generally this time should be an evening hour that gives people who work typical jobs a chance to get off of work, perhaps deal with child care, and then get to the location of the hearing. For some, an occasional weekend time is often welcome. Hearings at times such as 9:00 a.m. or 3:00 p.m. are not good; it is difficult for many members of the public to make daytime meetings.]

Public hearings will be held at **places** accessible by bus and otherwise convenient and not **intimidating** to most people who might benefit from the use of funds. Public hearings will be held at Community Center x, School y, and Library z. The public hearing to approve the final Annual Action Plan or final Five-Year Strategy will be conducted at City Hall.

Public Hearings and Populations with Unique Needs

All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English when requests are made at least five working days prior to a hearing.

The Conduct of Public Hearings

To ensure that public hearings are meaningful to residents, each public hearing will be conducted in the presence of the Mayor and City Council. Also, each resident choosing to speak will be allowed a minimum of five? seven? ten? minutes to make a verbal presentation. [Editorial Note. In some cases it might be ok if public hearings about "needs" are not held with elected officials present; you decide what is needed in your community.]

THE STAGES IN THE PROCESS

A. Identifying Needs

Because the housing and community development needs of low and moderate income people are so great and so diverse, priorities must be set in order to decide which needs should get more attention and more resources than other needs. This is the basic reason the Consolidated Plan exists.

The laws and regulations require a public hearing each year to obtain residents' opinions about needs, and what priority those needs have. In order to encourage public involvement, 3? 5? n? public hearings will be held in different neighborhoods [accessible by bus?] to determine the specific needs and priorities identified by low and moderate income people. [Editorial Note: As indicated above, it might be ok if these "needs" hearings are conducted with city staff, not elected officials. Perhaps one "needs" hearing should be held in front of at least a subcommittee of the City Council if not the full City Council.]

Public hearings about needs will be completed 30 days? 45 days? 60 days? before a draft Annual Action Plan is published for comment, so that the needs identified can be considered by the City and addressed in the draft Annual Action Plan.

B. The "Proposed" Annual Action Plan (and/or Five-Year Strategy)

The law providing the funds covered by this Citizen Participation Plan calls for improved accountability of jurisdictions to the public. In that spirit and in compliance with the terms of the law, ____ (City) ____ will use the following procedures.

General Information

At the beginning of this stage, ____ (City) ____ will provide the public with an estimate of the amount of CDBG, HOME, ESG, and HOPWA funds it expects to receive in the upcoming year, along with a description of the range of types of activities that can be funded with these resources. Also, the public will be given an estimate of the amount of these funds which will be used in ways that will benefit low and moderate income people.

The plans of ____ (City) ____ to minimize the extent to which low and moderate income people will have to leave their homes as a result of the use of these federal dollars (called "displacement") will also be available at this time. This "anti-displacement plan" will also describe how ____ (City) ____ will compensate people who are actually displaced as a result of the use of these funds, specifying the type and amount of compensation.

Technical Assistance

City staff will work with organizations and individuals representative of low and moderate income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact City staff for technical assistance before completing a proposal form.

Availability of a Proposed Annual Action Plan

Thirty days? forty-five days? sixty days? after the last public hearing about housing and community development needs, ____ (City) ____ will notify the public that a Proposed Annual Action Plan is available. The means of "notice" described earlier in the section on "Public Notice" will be used.

Also, the date the Proposed Annual Action Plan is available to the public will be at least 60 days? 75 days? 90 days? prior to the date a Final Annual Action Plan is approved by the Mayor and City Council so that low and moderate income people will have a reasonable opportunity to examine it and to submit comments. [Editorial Note: The regulations only require a 30-day period.]

Copies of the Proposed Annual Action Plan will be made available to the public for free and without delay. In addition, copies will be available at the locations specified above in the section, "Public Access to Information." A summary of the Proposed Annual Action Plan will also be written and provided free of charge to those requesting it.

So that low and moderate income people can determine the degree to which they might be affected, they will be provided complete copies of the Proposed Annual Action Plan, containing: all HUD-required sections, the HUD-required Priorities Table, and a written description of all proposed uses of CDBG, HOME, ESG, and HOPWA. At a minimum, this description shall include the type of activity, its location, and the amount of federal money to be allocated to it.

Public Hearing and Further Action

A public hearing [Editorial Note: Should there be more than one?] about the Proposed Annual Action Plan will be conducted by the Mayor and City Council 30 days? 45 days? 60 days? after it is available to the public. In addition, this public hearing will be held so that there are another 30 days? 15 days? before a Final Annual Action Plan is approved by the Mayor and City Council so that the elected officials can consider the public's comments from the public hearing.

In preparing a Final Annual Action Plan, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Annual Action Plan will have a section that presents all comments and explains why any comments were not accepted.

C. The "Final" Annual Action Plan (and/or Five-Year Strategy)

Copies of the Final Annual Action Plan and a summary of it will be made available to the public for free and within two days of a request. In addition, copies will be available at the locations specified above in the section, "Public Access to Information."

D. "Amendments" to the Annual Action Plan (and/or Five-Year Strategy)

The Final Annual Action Plan will be amended any time there is: a change in one of the Priorities presented on the HUD-required Priority Table; a change in the use of money to an activity not mentioned in the Final Annual Action Plan; or, a change in the purpose, location, scope, or beneficiaries of an activity (described more fully later). The public will be notified whenever there is an amendment.

"Substantial" Amendments

The following will be considered "substantial" amendments:

1. A change in the use of CDBG money from one activity to another.
2. A change in the use of HOME, ESG, or HOPWA money from one activity to another.
3. The elimination of an activity originally described in the Annual Action Plan.
4. The addition of an activity not originally described in the Annual Action Plan.
5. A change in the purpose of an activity, such as a change in the type of activity or its ultimate objective—for example, a change in a construction project from housing to commercial.
6. A meaningful change in the location of an activity.
7. A change in the type or characteristics of people benefiting from an activity. Among the "characteristics" are:
 - a. The HUD-recognized income levels of: 0-30 percent of area median income; between 31 percent and 50 percent of AMI, and between 51 percent and 80 percent of AMI.
 - b. Race or ethnicity.
 - c. Renter or homeowner
 - d. Single households, small ones (two to four persons), large ones (five or more persons).
8. A 10 percent? 15 percent? 20 percent? decrease in the number of low or moderate income people benefiting from an activity.
9. A change in the scope of an activity, such that there is a 10 percent? 15 percent? 20 percent? increase or decrease in the amount of money allocated to the activity.

Public Notice and Public Hearing for Substantial Amendments

There must be reasonable notice of a proposed Substantial Amendment so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Substantial Amendments:

1. There will be 30 days advance notice of and availability of a proposed Substantial Amendment before there is a public hearing about it.

2. A detailed written description of the proposed Substantial Amendment will be made available to the public at no cost within two working days of a request. Also, copies will be available at the locations indicated earlier in this Citizen Participation Plan under "Public Access to Information."
3. There will be a public hearing regarding the proposed Substantial Amendment conducted by the Mayor and City Council. This public hearing will not take place until the public has had 30 days to review the proposed Substantial Amendment.
4. The public hearing will be held no sooner than two weeks prior to submission to HUD.
5. In preparing a Final Substantial Amendment, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The Final Substantial Amendment will have a section that presents **all** comments and explains why any comments were not accepted.

E. The Annual Performance Report

Every year, (City) must send into HUD an Annual Performance Report within 90 days of the close of the program year. In general, the Annual Performance Report must describe how funds were actually used and the extent to which these funds were used for activities that benefited low and moderate income people.

Public Notice and Public Hearing for Annual Performance Report

There must be reasonable notice that an Annual Performance Report is available so that residents will have an opportunity to review it and comment on it. Notice will be made according to the procedures described earlier in this Citizen Participation Plan, with the addition of the following procedures specifically for Annual Performance Reports:

1. There will be 30 days? 45 days? 60 days? advance notice of and availability of an Annual Performance Report before there is a public hearing about it.
2. A complete copy of the Annual Performance Report will be made available to the public at no cost within two working days of a request. Copies will be available at the locations indicated earlier in this Citizen Participation Plan under "Public Access to Information."
3. There will be a public hearing regarding the Annual Performance Report. [Editorial Note: Although the law clearly calls for a public hearing at this stage, HUD's regs do not explicitly require one at this point. However, in the spirit of "enhanced public accountability" (also in the law), a public hearing at this stage is very important.]
4. This public hearing will be conducted by the Mayor and City Council, in the interest of public accountability. It will not take place until the public has had 30 days? 45 days? 60 days? to review the Annual Performance Report.
5. In preparing an Annual Performance Report for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing. The Annual Performance Report sent to HUD will have a section that presents **all** comments and explains why any comments were not accepted.

Contents of the Annual Performance Report

The Annual Performance Report presented to the public will contain at least as much detail as was required by HUD for CDBG Grantee Performance Reports. The Annual Performance Report will have an accounting for each activity in any Action Plan, until an activity is officially "closed-out" with HUD by the jurisdiction. For each activity the details presented will include, but not be limited to:

1. Activity Number from the Action Plan.
2. Name of the Activity plus its HUD "Activity Title" with regulation reference.
3. A description of the activity that is in enough detail for the public to have a clear understanding of the nature of the activity.

4. The name of the entity carrying out the activity.
5. The location of the activity.
 - a. Generally, this will be a street address or some other information showing specifically where the activity was (or is) being carried out.
 - b. For public facility activities such as street reconstruction not located at a specific street address, the beginning and ending points of the activity will be indicated.
 - c. For activities claiming to meet the "areawide benefit test," the location will also include the census tracts and/or block groups making up the service area of the activity. Also, the percentage of low/mod income persons in the service area will be indicated.
 - d. For multi-family housing activities, the address of each building and the number of units in the building both before and after assistance will be given.
6. The description of economic development activities will include the amount of the loan, the interest rate, and the length of the loan. It will also indicate the number of permanent, full-time jobs to be created or retained, with the number of such jobs to be held by or available to low/mod income people indicated in parentheses. The same information will be provided for part-time jobs, stating the number of hours per week the part-time jobs offer.
7. "Float Loan Funded" activities and "Section 108 Loan Guaranteed" activities should be clearly identified as such.
8. The date the activity was initially funded.
9. The "national objective" the activity claims to meet.
10. The status of an activity, such as whether it is completed, underway, or canceled.
11. The amount of CPD dollars "budgeted" and the amount "spent." The amount "spent" shall be given for the year, and separately for the life of the activity to date.
12. For public service activities, the amount of money which meets HUD's definition of "unliquidated obligation" will be reported.
13. If "program income" dollars and/or "revolving loan fund" dollars are being used for an activity, this will be indicated.
14. The accomplishments for the activity will be a description of what was actually done, including numerical measures when appropriate, such as number of units of housing rehabbed and number of individuals or households served. For economic development activities, the report will show the total number of jobs created or retained, plus the number of these held by or available to low/mod income people. For part-time jobs, the report will include the number of hours worked per week, and separately indicate the total number of "full-time-equivalent" jobs.
15. For activities that provide a direct benefit to individuals or households, the report will show: the number of individuals or households served, the number which were "moderate" income; the number which were "low" income; and, the number which were White, Black, Latino, or Asian.

COMPLAINT PROCEDURES

Written complaints from the public will receive a meaningful, written reply within 15 working days.

CHANGING THE CITIZEN PARTICIPATION PLAN

This Citizen Participation Plan can be changed only after the public has been notified of an intent to modify it, and only after the public has had a reasonable chance to review and comment on proposed substantial changes to it.

THE COMMUNITY ADVISORY COMMITTEE

(City) has created a Community Advisory Committee (CAC) in the spirit of the law, which calls for increased accountability to the public, as well as the encouragement of active participation by low and moderate income people.

The CAC is a 25? 152-member body that contributes to public participation by helping to: identify housing and community development needs; establish priorities relating to those needs; propose activities and projects to address high-priority needs; and, suggest the amount of federal, state, and local monies to be allocated to those activities.

At any given time, no less than 70 percent of the CAC membership shall be comprised of individuals representing low income people and/or organizations which serve low income people. At least 50 percent of these members shall actually be low-income people.

All CAC meetings are open to the public and are advertised as described above in the "Public Notice" section of this Citizen Participation Plan.

All CAC meetings will be held at neighborhood sites, such as the Smith Community Center, the meeting hall at Kennedy Towers Seniors Residence, the Fish School, or the West Side Branch library. All facilities are accessible to people with disabilities.

All CAC meetings will be held at times convenient for lower income people, so that as many people can participate as possible. In general, meetings will be held after 6:00 p.m.

The Chair and/or Vice-Chair will establish the agenda of CAC meetings, in cooperation with City staff. Only the Chair or Vice-Chair can cancel or reschedule a CAC meeting.

The CAC will receive monthly performance updates that shall also be available to the public. Performance updates will be provided to the CAC seven days prior to a monthly meeting.

The CAC will recommend to the Mayor and City Council how to allocate all CDBG, HOME, ESG, and HOPWA funds, including "program income" associated with these, monies left unspent and unobligated from the previous program year, and any additional (not previously anticipated) federal fund allotments. In no event shall CDBG, HOME, ESG, or HOPWA funds be allocated without review by the CAC.

APPENDIX 3

LETTER TO HUD'S FIELD OFFICES

U.S. Department of Housing and Urban Development
Washington, D.C. 20410

February 23, 1999

MEMORANDUM TO SEC REPS AND FIELD STAFF

FROM: Andrew Cuomo, Secretary

SUBJECT: Consolidated Plan and the Involvement of Persons with Disabilities and Advocates

Department regulations for citi2en participation in development of the Consolidated Plan calls for jurisdictions to include data regarding the housing needs of people with disabilities. While the regulations clearly define persons with disabilities as those with physical, mental, and emotional impairments and require their participation, it comes to our attention that persons with all types of disabilities and their housing needs *are* not always included.

Many jurisdictions have already made efforts to reach out to persons with disabilities and to advisory boards, task forces, and advocacy organizations. Those efforts have resulted in a fuller understanding of not only the needs, but the contributions of persons with disabilities to our communities.

It is critical that persons with disabilities and their housing needs be fully considered in every jurisdiction we *serve*. To do so, we must reach out to persons with disabilities and their chosen advocates and hear their perspectives. I want to remind you that each jurisdiction is required to (1) include persons with disabilities in the Consolidated Plan development process and (2) include data regarding housing needs of persons with disabilities.

We are committed to addressing the housing needs of communities through a holistic approach, which includes persons with disabilities: physical, mental and emotional. Thank you in advance for ensuring that the needs of this population *are* given full consideration and attention in the Consolidated Plans of the communities you *serve*.

APPENDIX 4

A SAMPLE HOUSING NEEDS STATEMENT FOR PEOPLE WITH PSYCHIATRIC AND DEVELOPMENTAL DISABILITIES

People with psychiatric and developmental disabilities share a common need for safe and affordable permanent housing. The challenge for many of these individuals is that their disability limits or precludes competitive employment, leaving them on fixed or very limited incomes—usually supplemental security (SSI) or social security disability (SSDI) benefits. This means that in addition to living with a disability, people with disabilities often struggle with the stresses of acute poverty, including the inability to afford decent and safe housing of their own choosing in the community.

Income data collected indicates that approximately 60 percent of people with a psychiatric disability receiving services from the county are on SSI, SSDI, or other forms of public assistance, receiving around \$500/month. 75 percent of these individuals have incomes below \$10,000/year. The crisis facing people with developmental disabilities is equally as severe with close to 90 percent of consumers living on some form of public assistance, and 80 percent of these adults living on incomes of less than \$10,000 a year. In a community with a median household income of \$43,407, these individuals are extremely low income (between 13% and 20% of median area income) and have little or no buying power in the housing market. Median rents in the lower cost *areas* are between \$450-500 a month—a rental *expense* that would consume the majority, if not all, of the monthly income of an individual with a disability living alone. Consequently, permanent, affordable housing alternatives in the community *are* close to non-existent.

In addition, waiting lists for long-term residential alternatives are long. Currently, there *are* approximately 800 adults with developmental disabilities waiting for housing and residential services, and this number continues to grow. As a consequence, many adults with developmental disabilities *are* unable to move out of quasi-institutional settings, or continue to live at home with family when they are unable to get the supports they would need to live in a more independent setting.

The majority of people with psychiatric or developmental disabilities experience housing problems or housing need in some form: rent burden; overcrowding; substandard housing; inability to move out of an institutional or residential treatment setting beyond the period of need; and homelessness. The costs to both individuals and the service system *are* great. It is now known that housing stability and housing satisfaction correlate with lower service utilization, particularly inpatient hospitalization days, and rehabilitation. Furthermore, the availability of affordable housing alternatives for people with disabilities reduces reliance on expensive institutional and congregate alternatives beyond the period of individual need.

Homeless

There are currently about 150 homeless individuals with a major mental illness or developmental disability residing within the community. These individuals are living in emergency shelters, in abandoned buildings, or in places not suitable for human habitation. Based on data from outreach programs, approximately 80 percent of these individuals are homeless for the first time, and the remaining 20 percent are chronically homeless, recycling through overcrowded/doubled up housing situations, in-patient facilities, jails, and other temporary accommodations. These homeless people with disabilities have lost all meaningful ties with family, and approximately 70 percent have no previous history with the mental health or developmental disability system. Approximately 40 percent have a secondary diagnosis of episodic or chronic substance abuse. All of these individuals *are* very low income, relying on entitlements such as SSI or SSDI or are without any stable source of income.

Group Homes, Adult Foster Care, or Board and Care Homes

There are currently 500 people with psychiatric or developmental disabilities residing in large government-funded group homes, adult foster *care* or board and *care* homes. Though a formal assessment has not been conducted, it is likely that many of these adults would choose to, and certainly could, live in housing alternatives if

affordable housing and consumer-centered support alternatives were available to them. For some, a lack of safe and affordable housing forces consumers to remain in expensive institutional settings beyond the period of need or preference.

Living Dependently with Family and/or Friends

There are 1,500 adults with psychiatric or developmental disabilities receiving *services* through the county mental health and mental retardation systems who *are* living dependently with family or friends. The majority is living as adult dependents with parents, siblings, or other relatives, though many would choose to live independently if other housing options were affordable. As pointed out *earlier*, because the majority of these adults have incomes of \$10,000 or less, finding safe, affordable housing options in the community is elusive if not impossible. In addition, there is the growing problem of adults with developmental disabilities whose parents *are aging* and may not be able to *care* for their children in the future.

Adults Living Alone or Independently

There *are* approximately 2,000 adults with psychiatric or developmental disabilities who are living alone or independently with family or friends. Though hard numbers *are* not available, anecdotal evidence suggests that many of these adults experience housing problems. The most common housing problems *experienced* by consumers *are excessive rent* burden, with many consumers paying over 50 percent of their income in rent, and/or living in substandard housing, especially unlicensed boarding homes.

Conclusion

These sobering statistics document the severity of the housing crisis facing people with disabilities in the community. Simply put, people with disabilities *are* too poor to obtain decent and affordable housing unless they have some type of housing assistance. Without affordable housing, people with disabilities continue to live at home with aging parents, in crowded homeless shelters, in "transitional" residential settings such as group homes or board and *care* homes, in institutions, or *are forced* to choose between seriously substandard housing or paying most of their monthly income towards rent.